

**APPENDIX TO PLAINTIFF' MOTION FOR AN ORDER SHORTENING TIME FOR
HEARING ON PLAINTIFFS' MOTION TO REMAND VOLUME 1 OF 2**

INDEX:

<u>EXH No.</u>	<u>DOCUMENT</u>	<u>VOL.</u>	<u>PAGE NO.</u>
1	MGM Resorts International, et. al. v. Carlos Acosta, et. al. 2:18-cv-01288-APG-PAL – Complaint for Declaratory Relief	1	000001-000061
2	MGM Resorts International, et. al. v. Carlos Acosta, et al. 2:18-cv-01288-APG-PAL – First Amended Complaint for Declaratory Relief	1	000062-000193
3	MGM Resorts International, et. al. v. David Aase, et al. 2:18-cv-06113-JAK-E – Complaint for Declaratory Relief	2	000194-000375
4	Declaration of Mark P. Robinson, Esq.	2	000376-000377
5	Declaration of Rahul Ravipudi, Esq.	2	000378-000379

Dated: July 19, 2018

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CERTIFICATE OF SERVICE

Pursuant to F.R.C.P. 5(b), I hereby certify that I am an employee of EGLET PRINCE, and on the 19th day of July, 2018, I did cause a true and correct copy of the foregoing document **APPENDIX TO PLAINTIFFS' MOTION FOR AN ORDER SHORTENING TIME FOR HEARING ON PLAINTIFFS' MOTION TO REMAND VOLUME 1 OF 2** to be filed and served electronically via the Court's CM/ECF system.

/s/Crystal Garcia

An employee of EGLET PRINCE

EXHIBIT 1

MGM Resorts International, et al. v. Carlos
Acosta, et al.

2:18-cv-01288-APG-PAL
Complaint for Declaratory Relief

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17 RESORT GROUP, MANDALAY BAY, LLC, MGM RESORTS FESTIVAL
18 GROUNDS, LLC, and MGM RESORTS VENUE MANAGEMENT, LLC

19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21
22 MGM RESORTS INTERNATIONAL,
MANDALAY RESORT GROUP,
23 MANDALAY BAY, LLC f/k/a MANDALAY
CORP., MGM RESORTS FESTIVAL
24 GROUNDS, LLC, MGM RESORTS VENUE
MANAGEMENT, LLC

25 Plaintiffs,

26 vs.

27 CARLOS ACOSTA; EMMANUEL AFFRAN;
28 GREG AGUAYO; LILLIAN AGUIRRE;

Case No.

**COMPLAINT FOR DECLARATORY
RELIEF**

1 DIONNDRA ALEXANDER; LESLIE
 2 ALWORTH; ENRIQUE ARGUETA; SHANE
 3 ARMSTRONG; IMARI AUSBIE; TINA
 4 MARIE AVERY; JEFFREY BACHMAN;
 5 JOSEPH I. BALAS; BREANNA GRACE
 6 FRANCL BALDRIDGE; MALINDA
 7 BALDRIDGE; COLE BALDWIN; PAUL
 8 BALFOUR; ALICIA BEATTY; ELIZABETH
 9 BEATTY; MATTHEW BEATTY; BRANDY
 10 BEAVER; BRANDON CHARLES BECKETT;
 11 TINA BEDARTES; CHICO BELSER;
 12 CHRISTI BERAN; KAREN BERNEY;
 13 JENNIFER L. BITHELL; RUSSELL BLECK;
 14 AARON BOUPHAPRASEUTH; JOSHUA
 15 BRADY; CHANDRA BRIDGES; CRAIG
 16 ALAN BROCKETT; DEBBIE BROCKETT;
 17 KALI BROCKETT; LEXIA BROCKETT;
 18 CAITLIN BRUNNER; ANDRE BRYANT;
 19 JORI BUCKLAND; TIFFANIE BUEHLER;
 20 ANTHONY BURNS; ANDRETTI CAGE;
 21 KIMBERLY CALDERON; EARLLITRA
 22 DANIELLE CARTER; ATHENA CASTILLA;
 23 SHAYLA CATALDO; TEQUELA
 24 CHAPPELL; SAVANNA CHASCO; DANNY
 25 CLUFF; GREG CLUFF; CODY COFFER;
 26 MARKIE COFFER; CONNIE D. COLEMAN;
 27 KIMBERLY COLLINS; SUE ANN
 28 CORNWELL; DANIEL CORTES; BRETT
 COSSAIRT; MANDI CROWDER; CHANELL
 CUELLAR; JUAN CUELLAR; RAINNA
 RUSK DAVIS; WHITNEY DAY; JOHN
 DEANE; RACHEL DELAPAZ; HANNAH
 DOMINGUEZ; JOMONT DOTTON;
 SANDRA DOUGLAS; MICHAEL DYER;
 HUGH JOSEPH DYER III; SONYA ESTERS;
 EMILY EVANS; MICHELLE EVANS;
 KRISTINA FALCO; CASSANDRA FIGGERS;
 DEANNA FINLEY; JUDITH FISHER;
 BRISTINA FLATT; KENNETH SHAYNE
 FLETCHER; BETH GALOFARO; WILLIAM
 GALVEZ; LACY GANN; DANA GETREU;
 COURTNEY GIBSON; JENNIFER GIBSON;
 MICHAEL MERCED GILARDINO; JIMMY
 GILMORE; TOMAS GONZALEZ; HEATHER
 GOOZE; MICHAEL GREENFIELD; JULIAN
 HAMILTON; ANGEL HANDLIN; DARREL
 HANDLIN; MATTHEW HANSEN; MICHAEL
 HANSSON; CAROL HARDEN; JUSTIN
 HARMAN; LAKHESHA HARRIS; TRINO
 HARRIS; JENNIFER HAUT; ELIZABETH
 HEFLEY; GABRIELLE HEMPHILL;
 WILLIAM HENNING; RICHARD CRAIG
 HERMANN; MARIO HERRERA;
 JACQUELYN HOFFING; MARCELLA
 HOFFMAN; BRITTANY HORTON; MEGAN

1 IANNUZZI; LUCA ICLODEAN; DMOREA
 JACKSON; JARON ANTHONY JAMERSON;
 2 ANGELINA JAMES; COREY JOHNSON;
 DEANDRE JOHNSON; JAYNELLE
 3 JOHNSON; JOHANNA JOHNSON; SARAH
 JOHNSON; EDGAR T. JONES; CHIQUANA
 4 JOSHUA; MYLES KALK; AUTUM
 KAPINKIN; JAWAUNDO W. KIMMONS;
 5 WILLIAM KING; NIKKOLE KNIGHT;
 ANGELL KNITTLE; ANNA KOPP; DAVID
 6 KRONBERG; LORI KRUMME; MARY
 LYNN KUEFFNER; ATHEA LAVIN; AMIAH
 7 LEE; ERIKA LEE; LISA LEE; NICK LEMAY;
 ALAN I. LEVITT; CHARLES LEXION;
 8 YOLANDA LIZARDO; GABRIELA
 LOMAGLIO; VICENTE LOPEZ; SHAWNA
 9 LOTT; JOSHUA LUIZ; JOY LUJAN;
 BRITTANY MACKAY; KERI MAHER;
 10 CHRISTIAN MARQUEZ; TRACI
 MARSHALL; RICHARD MASUCCI;
 11 LINDSEY MATA; TRAVIS MATHESON;
 STEVE MCBEE; DENISE MCCLELLAN;
 12 LONNIE MCCORVEY; LYNNE MCCUE;
 TAMIKA MCGILL; CARMEN MCKINLEY;
 13 CLEVELAND MCMATH; DOREEN
 MEDINA; TREZA MEKHAIL; PAIGE
 14 MELANSON; ROSEMARIE MELANSON;
 STEPHANIE MELANSON; STEPHEN
 15 MELANSON; ESTATE OF AUSTIN MEYER;
 ROMEO MEYER; ROBERT MILLER;
 16 PHYLYSSA MONTOYA; ALYSSA MOORE;
 KATRINA MORGAN; SHANCELA MYERS;
 17 MARIROSE NAING; ANTHONY DON E.
 NOARBE; AMBER NORCIA; ELSA NUNEZ;
 18 ROSE O'TOOLE; KUULEI OTIS; STACIE
 OWENS; CHAD PACKARD; KAYCEE
 19 PAUL; ELISA PEREZ; ANGELA MARIE
 PERRY; JEREMY PICKETT; JOSE PLAZA;
 20 MACKENZIE PLUTA; DARRIAN PORTER;
 LAURA A. PUGLIA; KARMJIT RAJU;
 21 JASMINE REIN; STANLEY RENDON; LEA
 RICHMOND; ISRAEL RIVERA; TONIA
 22 ROCHELEAU; MICHAEL ROLLAND;
 MARK RUSSELL; VINCENT SAGER;
 23 CHRISTOPHER SALINAS; LENEA
 SAMPSON; ALYSSA SANDS; JOSEPH
 24 SARTIN; SARAH SCARLETT; SHAWN
 SCARLETT; SHAYLENNE SCARLETT; KIM
 25 SCHMITZ; ALISON SHEEHE;
 CHRISTOPHER SHUEMAKER; BREANNA
 26 SKAGEN; JENNIFER SKOFF; CHEYENNE
 SLOAN; EDEN SMITH; JASPER SMITH;
 27 YVONNE SMITH; MARTIN SOLANO;
 SHELBY STALKER; CHRIS STEWART;
 28 GREGORY TAVERNITE; SAM TAYLOR;

1 WENDY TAYLOR-HILL; REGINALD
2 THARPS; CHRISTINA THEBEAU; DAVID
3 W. THERIAULT; BREYANA THOMAS;
4 GABRIELLE THOMAS; SAVANNAH
5 THOMAS; STEVEN THOME; ALVA BRUCE
6 TILLEY; MARIYA TORO; KATHRYN
7 TRESSLER; JENNIFER A. TURNER;
8 DEBORAH URRIZAGA; WILLIAM F.
9 VANDERVEER; FRANK VEALENCIS;
10 TAMARA VEALENCIS; REGINA VIOLA;
11 ALYSSA WALKER; TIKIESHA WASP;
12 DONALD WELTY; ZACHARY WILCOX;
13 JORDAN WILKINSON; JEFFERY
14 WILLIAMS; TERACIO WILLIAMS; GARY
15 "OPIE" ALLEN WISE; JOHN YONTS; JAMIE
16 ZALESKI; JANET ZMYEWSKI; THOMAS
17 ZMYEWSKI,

18 DEFENDANTS.

INTRODUCTION

1
2 1. On October 1, 2017, Stephen Paddock carried out a mass attack at the Route 91
3 Harvest Festival in Las Vegas, Nevada.

4 2. Paddock intended to inflict mass injury, death and destruction. He killed 58
5 persons and injured some 500 others. Paddock's attack resulted in the highest number of deaths of
6 any mass shooting in the Nation's history.

7 3. Security for the concert was provided by Contemporary Services Corporation,
8 whose security services have been certified by the Secretary of Homeland Security for protecting
9 against and responding to acts of mass injury and destruction.

10 4. Recognizing the national interest in such events, and in the development and
11 deployment of services certified by the Secretary of Homeland Security to prevent and respond to
12 such events, Congress has provided original and exclusive federal jurisdiction for any claims of
13 injuries arising out of or relating to mass violence where services certified by the Department were
14 deployed.

15 5. Plaintiff MGM Resorts Festival Grounds, LLC owns and operates the Las Vegas
16 Village, at 3901 South Las Vegas Boulevard, Las Vegas, Nevada 89119, where the Route 91
17 Harvest Festival was held. Plaintiff Mandalay Bay, LLC owns and operates the Mandalay Bay
18 resort, which is adjacent to Las Vegas Village. Plaintiff MGM Resorts International is the parent
19 corporation, with an indirect 100% interest in Mandalay Bay, LLC, and MGM Resorts Festival
20 Grounds. Plaintiff MGM Resorts Venue Management, LLC is a Nevada limited liability
21 company.

22 6. Paddock carried out his mass attack on the concert from a room on the 32nd floor
23 of the Mandalay Bay resort.

24 7. Following Paddock's attack, over 2,500 individuals ("Claimants") have brought
25 lawsuits, or threatened to bring lawsuits, against Plaintiffs MGM Resorts Festival Grounds, LLC,
26 MGM Resorts International, Mandalay Bay, LLC, Mandalay Resort Group, and MGM Resorts
27 Venue Management, LLC (collectively, "the MGM Parties"), alleging that the MGM Parties
28 (among others) are liable for deaths, injuries, and emotional distress resulting from Paddock's

1 attack. Claimants subsequently voluntarily dismissed these cases before they could be resolved,
2 apparently with the intent of refileing.

3 8. Named as defendants in this case are Claimants who have brought lawsuits (which
4 they subsequently voluntarily dismissed) against the MGM Parties, alleging claims arising from
5 Paddock's attack, and persons who, through counsel, have threatened to bring such claims against
6 the MGM Parties.

7 9. Congress has enacted legislation to support the development of new technologies
8 and services to prevent and respond to mass violence. That legislation, the Support Anti-
9 Terrorism by Fostering Effective Technologies Act of 2002, 6 U.S.C. §§ 441-444 (also known by
10 the acronym, the "SAFETY Act"), provides a calibrated balance of remedies and limitations on
11 liabilities arising from mass attacks committed on U.S. soil where services certified by the
12 Department of Homeland Security were deployed.

13 10. In the case of Paddock's mass attack, certified technologies or services were
14 deployed by a professional security company, Contemporary Services Corporation ("CSC"),
15 which was employed as the Security Vendor for the Route 91 concert. As alleged in more detail
16 below, Paddock's mass attack meets the requirements of the SAFETY Act as set forth in the
17 statute and the Regulations promulgated by the Department of Homeland Security.

18 11. Defendants' actual and threatened lawsuits implicate the services provided by CSC
19 because they implicate security at the concert, for example security training, emergency response,
20 evacuation, and adequacy of egress.

21 12. As a result, the SAFETY Act applies to and governs all actions and any claims
22 arising out of or relating to Paddock's mass attack. There are five key aspects of the Act and
23 implementing regulations promulgated by the Department of Homeland Security as authorized and
24 contemplated by the SAFETY Act. 6 C.F.R. § 25.1 et seq.

25 13. First, the SAFETY Act creates a "Federal cause of action for claims arising out of
26 [or] relating to" an act of mass violence where certified services were deployed and where such
27 claims may result in losses to the Seller of the services. 6 U.S.C. § 442(a)(1).

28 14. Second, the SAFETY Act expressly provides the federal courts with "original and

1 exclusive jurisdiction over all actions for any claim for loss” arising out of or related to such an
2 attack. 6 U.S.C. § 442(a)(2).

3 15. Third, as confirmed by the Secretary’s implementing regulations promulgated after
4 enactment of the SAFETY Act, the federal cause of action created by the statute is the exclusive
5 claim available in such circumstances. 6 U.S.C.

6 § 442(a)(1). The regulations state: “There shall exist only one cause of action for loss of property,
7 personal injury, or death for performance or non-performance of the Seller’s Qualified Anti–
8 Terrorism Technology in relation to an Act of Terrorism.” 6 C.F.R. § 25.7(d).

9 16. Fourth, the regulations further provide that “Such cause of action may be brought
10 only against the Seller of the Qualified Anti–Terrorism Technology and may not be brought
11 against the buyers, the buyers’ contractors, or downstream users of the Technology, the Seller’s
12 suppliers or contractors, or any other person or entity.” 6 C.F.R. § 25.7(d).

13 17. Fifth, to ensure compensation for victims in appropriate cases, the SAFETY Act
14 requires that the Seller “obtain liability insurance of such types and in such amounts as shall be
15 required in accordance with this section and certified by the Secretary to satisfy otherwise
16 compensable third-party claims arising out of, relating to, or resulting from an act of terrorism.” 6
17 U.S.C. § 443(a)(1).

18 18. Congress enacted the SAFETY Act in recognition of the strong national interest in
19 encouraging the development and use of technologies and services that can help prevent and
20 respond to mass violence. The Act does so in part by assurance of limited liability in the
21 unfortunate event that an incident of mass violence occurs and injuries occur despite the
22 deployment of such technology. The Act also does so by creating original and exclusive
23 jurisdiction for the resolution of all controversies in federal court. 6 U.S.C. § 442(a)(2).

24 19. The SAFETY Act expressly provides the federal courts with original and exclusive
25 jurisdiction over “all actions for and any claims for loss [or] injury” arising out of or relating to a
26 mass attack where certified services were provided and where such claims *may* result in losses to
27 the seller of those services. The Act and the associated regulations make clear that any such claim
28 against the MGM Parties must be dismissed.

20. By this action, the MGM Parties seek a declaratory judgment and further relief pursuant to the Declaratory Judgment Act, 28 U.S.C. §§ 2201 and 2202, that the MGM parties cannot be held liable to Defendants for deaths, injuries, or other damages arising from Paddock's attack.

PARTIES

A. PLAINTIFFS

21. Plaintiff MGM RESORTS INTERNATIONAL is a Delaware corporation with its principal place of business in Las Vegas, Nevada.

22. Plaintiff MANDALAY RESORT GROUP is a Nevada corporation with its principal place of business in Las Vegas, Nevada.

23. Plaintiff, MANDALAY BAY, LLC f/k/a MANDALAY CORP. is a Nevada limited liability company with a single member, Mandalay Resort Group.

24. Plaintiff MGM RESORTS FESTIVAL GROUNDS, LLC is a Nevada limited liability company with a single member, Mandalay Resort Group.

25. Plaintiff MGM RESORTS VENUE MANAGEMENT, LLC is a Nevada limited liability company with a single member, MGM Resorts International.

B. DEFENDANTS

26. Plaintiffs are informed and believe, and thereon allege, that defendant Carlos Acosta is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

27. Plaintiffs are informed and believe, and thereon allege, that defendant Emmanuel Affran is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

1 28. Plaintiffs are informed and believe and thereon allege that Defendant Greg Aguayo
2 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
3 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 29. Plaintiffs are informed and believe and thereon allege that Defendant Lillian
6 Aguirre is a resident of the State of Nevada. Defendant has, through counsel, asserted or
7 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
8 Las Vegas, Nevada.

9 30. Plaintiffs are informed and believe, and thereon allege, that defendant Dionndra
10 Alexander is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
11 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
12 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
13 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
14 BC684047.

15 31. Plaintiffs are informed and believe and thereon allege that Defendant Leslie
16 Alworth is a resident of the State of Nevada. Defendant has, through counsel, asserted or
17 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
18 Las Vegas, Nevada.

19 32. Plaintiffs are informed and believe, and thereon allege, that defendant Enrique
20 Argueta is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
21 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
22 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
23 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

24 33. Plaintiffs are informed and believe, and thereon allege, that defendant Shane
25 Armstrong is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
26 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
27 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Athena Castilla v.*
28 *MGM*, filed October 18, 2017, in the Los Angeles Superior Court (“LASC”), case number

1 BC680193.

2 34. Plaintiffs are informed and believe, and thereon allege, that defendant Imari Ausbie
3 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
4 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
5 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
6 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

7 35. Plaintiffs are informed and believe, and thereon allege, that defendant Tina Marie
8 Avery is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
9 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
10 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
11 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

12 36. Plaintiffs are informed and believe and thereon allege that Defendant Jeffrey
13 Bachman is a resident of the State of Nevada. Defendant has, through counsel, asserted or
14 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
15 Las Vegas, Nevada.

16 37. Plaintiffs are informed and believe and thereon allege that Defendant Joseph I.
17 Balas is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
18 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
19 Nevada.

20 38. Plaintiffs are informed and believe, and thereon allege, that defendant Breanna
21 Grace Franci Baldrige is a resident of the State of Nevada. Defendant has previously filed a
22 lawsuit (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs,
23 asserting claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in
24 *Baldrige, et al. v. MGM*, filed January 18, 2018, in Clark County District Court (“Clark
25 County”), case number A-18-767981-C.

26 39. Plaintiffs are informed and believe, and thereon allege, that defendant Malinda
27 Baldrige is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
28 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims

1 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Baldrige, et al. v.*
2 *MGM*, filed January 18, 2018, in Clark County District Court (“Clark County”), case number A-
3 18-767981-C.

4 40. Plaintiffs are informed and believe, and thereon allege, that defendant Cole
5 Baldwin is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
6 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
7 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
8 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

9 41. Plaintiffs are informed and believe and thereon allege that Defendant Paul Balfour
10 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
11 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
12 Nevada.

13 42. Plaintiffs are informed and believe and thereon allege that Defendant Alicia Beatty
14 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
15 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
16 Nevada.

17 43. Plaintiffs are informed and believe and thereon allege that Defendant Elizabeth
18 Beatty is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
19 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
20 Nevada.

21 44. Plaintiffs are informed and believe and thereon allege that Defendant Matthew
22 Beatty is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
23 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
24 Nevada.

25 45. Plaintiffs are informed and believe, and thereon allege, that defendant Brandy
26 Beaver is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 46. Plaintiffs are informed and believe, and thereon allege, that defendant Brandon
3 Charles Beckett is a resident of the State of Nevada. Defendant has previously filed a lawsuit
4 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting
5 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*
6 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
7 BC684047.

8 47. Plaintiffs are informed and believe and thereon allege that Defendant Tina Bedartes
9 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
10 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
11 Nevada.

12 48. Plaintiffs are informed and believe, and thereon allege, that defendant Chico Belser
13 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
14 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
15 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
16 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

17 49. Plaintiffs are informed and believe, and thereon allege, that defendant Christi Beran
18 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
19 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
20 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
21 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

22 50. Plaintiffs are informed and believe and thereon allege that Defendant Karen Berney
23 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
24 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
25 Nevada.

26 51. Plaintiffs are informed and believe, and thereon allege, that defendant Jennifer L.
27 Bithell is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
28 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising

1 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
2 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

3 52. Plaintiffs are informed and believe, and thereon allege, that defendant Russell
4 Bleck is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
5 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
6 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
7 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

8 53. Plaintiffs are informed and believe, and thereon allege, that defendant Aaron
9 Bouphapraseuth is a resident of the State of Nevada. Defendant has previously filed a lawsuit
10 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting
11 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*
12 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
13 BC684047.

14 54. Plaintiffs are informed and believe and thereon allege that Defendant Joshua Brady
15 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
16 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
17 Nevada.

18 55. Plaintiffs are informed and believe, and thereon allege, that defendant Chandra
19 Bridges is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23 56. Plaintiffs are informed and believe, and thereon allege, that defendant Craig Alan
24 Brockett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
25 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
26 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
27 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

28 57. Plaintiffs are informed and believe, and thereon allege, that defendant Debbie

1 Brockett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
2 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
3 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
4 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

5 58. Plaintiffs are informed and believe, and thereon allege, that defendant Kali Brockett
6 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
9 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

10 59. Plaintiffs are informed and believe, and thereon allege, that defendant Lexia
11 Brockett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
12 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
13 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
14 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

15 60. Plaintiffs are informed and believe, and thereon allege, that defendant Caitlin
16 Brunner is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
17 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
18 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Brunner v. MGM*, filed
19 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-
20 764745-C.

21 61. Plaintiffs are informed and believe, and thereon allege, that defendant Andre
22 Bryant is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
23 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
24 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
25 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

26 62. Plaintiffs are informed and believe, and thereon allege, that defendant Jori
27 Buckland is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
28 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising

1 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Buckland v. MGM*, filed
2 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-
3 764741-C.

4 63. Plaintiffs are informed and believe and thereon allege that Defendant Tiffanie
5 Buehler is a resident of the State of Nevada. Defendant has, through counsel, asserted or
6 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
7 Las Vegas, Nevada.

8 64. Plaintiffs are informed and believe and thereon allege that Defendant Anthony
9 Burns is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
10 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
11 Nevada.

12 65. Plaintiffs are informed and believe, and thereon allege, that defendant Andretti
13 Cage is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
14 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
15 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
16 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

17 66. Plaintiffs are informed and believe, and thereon allege, that defendant Kimberly
18 Calderon is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
19 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
20 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,
21 filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-18-
22 767288-C.

23 67. Plaintiffs are informed and believe, and thereon allege, that defendant Earllitra
24 Danielle Carter is a resident of the State of Nevada. Defendant has previously filed a lawsuit
25 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting
26 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*
27 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
28 BC684047.

1 68. Plaintiffs are informed and believe, and thereon allege, that defendant Athena
2 Castilla is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Athena Castilla v. MGM*,
5 filed October 18, 2017, in the Los Angeles Superior Court (“LASC”), case number BC680193.

6 69. Plaintiffs are informed and believe, and thereon allege, that defendant Shayla
7 Cataldo is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
8 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
9 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Cataldo v. MGM*, filed
10 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-
11 764738-C.

12 70. Plaintiffs are informed and believe, and thereon allege, that defendant Tequila
13 Chappell is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
14 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
15 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
16 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

17 71. Plaintiffs are informed and believe and thereon allege that Defendant Savanna
18 Chasco is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
19 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
20 Nevada.

21 72. Plaintiffs are informed and believe, and thereon allege, that defendant Danny Cluff
22 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
23 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
24 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
25 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

26 73. Plaintiffs are informed and believe and thereon allege that Defendant Greg Cluff is
27 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
28 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

1 74. Plaintiffs are informed and believe and thereon allege that Defendant Cody Coffe
2 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
3 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 75. Plaintiffs are informed and believe, and thereon allege, that defendant Markie
6 Coffe is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
9 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

10 76. Plaintiffs are informed and believe, and thereon allege, that defendant Connie D.
11 Coleman is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
12 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
13 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Gasper, et al. v. MGM*, filed
14 November 20, 2017, in Los Angeles Superior Court (“LASC”), case number BC684143

15 77. Plaintiffs are informed and believe, and thereon allege, that defendant Kimberly
16 Collins is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
17 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
18 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
19 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

20 78. Plaintiffs are informed and believe and thereon allege that Defendant Sue Ann
21 Cornwell is a resident of the State of Nevada. Defendant has, through counsel, asserted or
22 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
23 Las Vegas, Nevada.

24 79. Plaintiffs are informed and believe, and thereon allege, that defendant Daniel
25 Cortes is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
26 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
27 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
28 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

1 80. Plaintiffs are informed and believe, and thereon allege, that defendant Brett
2 Cossairt is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6 81. Plaintiffs are informed and believe and thereon allege that Defendant Mandi
7 Crowder is a resident of the State of Nevada. Defendant has, through counsel, asserted or
8 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
9 Las Vegas, Nevada.

10 82. Plaintiffs are informed and believe and thereon allege that Defendant Chanell
11 Cuellar is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
12 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
13 Nevada.

14 83. Plaintiffs are informed and believe and thereon allege that Defendant Juan Cuellar
15 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
16 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
17 Nevada.

18 84. Plaintiffs are informed and believe, and thereon allege, that defendant Rainna Rusk
19 Davis is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23 85. Plaintiffs are informed and believe and thereon allege that Defendant Whitney Day
24 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
25 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
26 Nevada.

27 86. Plaintiffs are informed and believe and thereon allege that Defendant John Deane is
28 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert

1 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

2 87. Plaintiffs are informed and believe, and thereon allege, that defendant Rachel
3 DelaPaz is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
4 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
5 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
6 filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

7 88. Plaintiffs are informed and believe, and thereon allege, that defendant Hannah
8 Dominguez is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
9 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
10 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
11 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number
12 BC684047.

13 89. Plaintiffs are informed and believe, and thereon allege, that defendant Jomont
14 Dotton is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
15 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
16 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
17 filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

18 90. Plaintiffs are informed and believe, and thereon allege, that defendant Sandra
19 Douglas is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
22 filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

23 91. Plaintiffs are informed and believe, and thereon allege, that defendant Michael
24 Dyer is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
25 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
26 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
27 filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

28 92. Plaintiffs are informed and believe, and thereon allege, that defendant Hugh Joseph

1 Dyer III is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
2 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
3 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
4 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

5 93. Plaintiffs are informed and believe, and thereon allege, that defendant Sonya Esters
6 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
9 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

10 94. Plaintiffs are informed and believe and thereon allege that Defendant Emily Evans
11 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
12 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
13 Nevada.

14 95. Plaintiffs are informed and believe, and thereon allege, that defendant Michelle
15 Evans is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
16 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
17 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
18 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

19 96. Plaintiffs are informed and believe, and thereon allege, that defendant Kristina
20 Falco is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
21 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
22 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
23 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

24 97. Plaintiffs are informed and believe, and thereon allege, that defendant Cassandra
25 Figgers is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
26 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
27 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
28 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

1 98. Plaintiffs are informed and believe and thereon allege that Defendant Deanna
2 Finley is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
3 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 99. Plaintiffs are informed and believe, and thereon allege, that defendant Judith Fisher
6 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
9 filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

10 100. Plaintiffs are informed and believe, and thereon allege, that defendant Bristina Flatt
11 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
12 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
13 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
14 filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

15 101. Plaintiffs are informed and believe, and thereon allege, that defendant Kenneth
16 Shayne Fletcher is a resident of the State of Nevada. Defendant has previously filed a lawsuit
17 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting
18 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*
19 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number
20 BC684047.

21 102. Plaintiffs are informed and believe and thereon allege that Defendant Beth Galofaro
22 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
23 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
24 Nevada.

25 103. Plaintiffs are informed and believe, and thereon allege, that defendant William
26 Galvez is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 104. Plaintiffs are informed and believe and thereon allege that Defendant Lacy Gann is
3 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
4 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

5 105. Plaintiffs are informed and believe and thereon allege that Defendant Dana Getreu
6 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
7 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
8 Nevada.

9 106. Plaintiffs are informed and believe, and thereon allege, that defendant Courtney
10 Gibson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
11 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
12 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
13 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

14 107. Plaintiffs are informed and believe and thereon allege that Defendant Jennifer
15 Gibson is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
16 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
17 Nevada.

18 108. Plaintiffs are informed and believe, and thereon allege, that defendant Michael
19 Merced Gilardino is a resident of the State of Nevada. Defendant has previously filed a lawsuit
20 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting
21 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*
22 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
23 BC684047.

24 109. Plaintiffs are informed and believe and thereon allege that Defendant Jimmy
25 Gilmore is a resident of the State of Nevada. Defendant has, through counsel, asserted or
26 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
27 Las Vegas, Nevada.

28 110. Plaintiffs are informed and believe, and thereon allege, that defendant Tomas

1 Gonzalez is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
2 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
3 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
4 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

5 111. Plaintiffs are informed and believe, and thereon allege, that defendant Heather
6 Gooze is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Gooze v. MGM*, filed
9 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-
10 764718-C.

11 112. Plaintiffs are informed and believe, and thereon allege, that defendant Michael
12 Greenfield is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
13 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
14 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v.*
15 *MGM*, filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number
16 BC687120.

17 113. Plaintiffs are informed and believe, and thereon allege, that defendant Julian
18 Hamilton is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
19 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
20 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
21 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

22 114. Plaintiffs are informed and believe and thereon allege that Defendant Angel
23 Handlin is a resident of the State of Nevada. Defendant has, through counsel, asserted or
24 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
25 Las Vegas, Nevada.

26 115. Plaintiffs are informed and believe and thereon allege that Defendant Darrel
27 Handlin is a resident of the State of Nevada. Defendant has, through counsel, asserted or
28 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in

1 Las Vegas, Nevada.

2 116. Plaintiffs are informed and believe, and thereon allege, that defendant Matthew
3 Hansen is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
4 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
5 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
6 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

7 117. Plaintiffs are informed and believe and thereon allege that Defendant Michael
8 Hansson is a resident of the State of Nevada. Defendant has, through counsel, asserted or
9 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
10 Las Vegas, Nevada.

11 118. Plaintiffs are informed and believe, and thereon allege, that defendant Carol Harden
12 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16 119. Plaintiffs are informed and believe and thereon allege that Defendant Justin
17 Harman is a resident of the State of Nevada. Defendant has, through counsel, asserted or
18 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
19 Las Vegas, Nevada.

20 120. Plaintiffs are informed and believe, and thereon allege, that defendant Lakhesha
21 Harris is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
22 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
23 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
24 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

25 121. Plaintiffs are informed and believe, and thereon allege, that defendant Trino Harris
26 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 122. Plaintiffs are informed and believe, and thereon allege, that defendant Jennifer Haut
3 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
4 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
5 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
6 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

7 123. Plaintiffs are informed and believe and thereon allege that Defendant Elizabeth
8 Hefley is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
9 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
10 Nevada.

11 124. Plaintiffs are informed and believe and thereon allege that Defendant Gabrielle
12 Hemphill is a resident of the State of Nevada. Defendant has, through counsel, asserted or
13 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
14 Las Vegas, Nevada.

15 125. Plaintiffs are informed and believe and thereon allege that Defendant William
16 Henning is a resident of the State of Nevada. Defendant has, through counsel, asserted or
17 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
18 Las Vegas, Nevada.

19 126. Plaintiffs are informed and believe, and thereon allege, that defendant Richard
20 Craig Hermann is a resident of the State of Nevada. Defendant has previously filed a lawsuit
21 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting
22 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*
23 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
24 BC684047.

25 127. Plaintiffs are informed and believe, and thereon allege, that defendant Mario
26 Herrera is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 128. Plaintiffs are informed and believe and thereon allege that Defendant Jacquelyn
3 Hoffing is a resident of the State of Nevada. Defendant has, through counsel, asserted or
4 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
5 Las Vegas, Nevada.

6 129. Plaintiffs are informed and believe, and thereon allege, that defendant Marcella
7 Hoffman is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
8 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
9 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
10 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

11 130. Plaintiffs are informed and believe, and thereon allege, that defendant Brittany
12 Horton is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16 131. Plaintiffs are informed and believe and thereon allege that Defendant Megan
17 Iannuzzi is a resident of the State of Nevada. Defendant has, through counsel, asserted or
18 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
19 Las Vegas, Nevada.

20 132. Plaintiffs are informed and believe, and thereon allege, that defendant Luca
21 Iclodean is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
22 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
23 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Iclodean v. MGM*, filed
24 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-
25 764716-C.

26 133. Plaintiffs are informed and believe, and thereon allege, that defendant Dmorea
27 Jackson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
28 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising

1 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
2 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

3 134. Plaintiffs are informed and believe, and thereon allege, that defendant Jaron
4 Anthony Jamerson is a resident of the State of Nevada. Defendant has previously filed a lawsuit
5 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting
6 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*
7 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
8 BC684047.

9 135. Plaintiffs are informed and believe, and thereon allege, that defendant Angelina
10 James is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
11 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
12 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
13 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

14 136. Plaintiffs are informed and believe, and thereon allege, that defendant Corey
15 Johnson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
16 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
17 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
18 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

19 137. Plaintiffs are informed and believe, and thereon allege, that defendant DeAndre
20 Johnson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
21 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
22 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
23 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

24 138. Plaintiffs are informed and believe, and thereon allege, that defendant Jaynelle
25 Johnson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
26 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
27 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
28 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

1 139. Plaintiffs are informed and believe, and thereon allege, that defendant Johanna
2 Johnson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6 140. Plaintiffs are informed and believe, and thereon allege, that defendant Sarah
7 Johnson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
8 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
9 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
10 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

11 141. Plaintiffs are informed and believe, and thereon allege, that defendant Edgar T.
12 Jones is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16 142. Plaintiffs are informed and believe, and thereon allege, that defendant Chiquana
17 Joshua is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
18 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
19 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
20 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

21 143. Plaintiffs are informed and believe and thereon allege that Defendant Myles Kalk is
22 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
23 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

24 144. Plaintiffs are informed and believe and thereon allege that Defendant Autum
25 Kapinkin is a resident of the State of Nevada. Defendant has, through counsel, asserted or
26 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
27 Las Vegas, Nevada.

28 145. Plaintiffs are informed and believe, and thereon allege, that defendant Jawaundo W.

1 Kimmons is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
2 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
3 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
4 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
5 BC684047.

6 146. Plaintiffs are informed and believe, and thereon allege, that defendant William
7 King is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
8 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
9 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,
10 filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-18-
11 767288-C.

12 147. Plaintiffs are informed and believe and thereon allege that Defendant Nikkole
13 Knight is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
14 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
15 Nevada.

16 148. Plaintiffs are informed and believe, and thereon allege, that defendant Angell
17 Knittle is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
18 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
19 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
20 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

21 149. Plaintiffs are informed and believe and thereon allege that Defendant Anna Kopp is
22 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
23 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

24 150. Plaintiffs are informed and believe, and thereon allege, that defendant David
25 Kronberg is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
26 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
27 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
28 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

1 151. Plaintiffs are informed and believe and thereon allege that Defendant Lori Krumme
2 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
3 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 152. Plaintiffs are informed and believe, and thereon allege, that defendant Mary Lynn
6 Kueffner is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
9 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

10 153. Plaintiffs are informed and believe and thereon allege that Defendant Athea Lavin
11 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
12 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
13 Nevada.

14 154. Plaintiffs are informed and believe, and thereon allege, that defendant Amiah Lee is
15 a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
16 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
17 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
18 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

19 155. Plaintiffs are informed and believe, and thereon allege, that defendant Erika Lee is
20 a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
21 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
22 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
23 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

24 156. Plaintiffs are informed and believe, and thereon allege, that defendant Lisa Lee is a
25 resident of the State of Nevada. Defendant has previously filed a lawsuit (which was subsequently
26 voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising from the
27 October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*, filed
28 November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

1 157. Plaintiffs are informed and believe, and thereon allege, that defendant Nick Lemay
2 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6 158. Plaintiffs are informed and believe, and thereon allege, that defendant Alan I. Levitt
7 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
8 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
9 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Gasper, et al. v. MGM*, filed
10 November 20, 2017, in Los Angeles Superior Court (“LASC”), case number BC684143

11 159. Plaintiffs are informed and believe, and thereon allege, that defendant Charles
12 Lexion is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16 160. Plaintiffs are informed and believe, and thereon allege, that defendant Yolanda
17 Lizardo is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
18 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
19 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
20 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

21 161. Plaintiffs are informed and believe and thereon allege that Defendant Gabriela
22 Lomaglio is a resident of the State of Nevada. Defendant has, through counsel, asserted or
23 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
24 Las Vegas, Nevada.

25 162. Plaintiffs are informed and believe, and thereon allege, that defendant Vicente
26 Lopez is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 163. Plaintiffs are informed and believe, and thereon allege, that defendant Shawna Lott
3 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
4 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
5 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Lott v. MGM*, filed
6 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-
7 764736-C.

8 164. Plaintiffs are informed and believe, and thereon allege, that defendant Joshua Luiz
9 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
10 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
11 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
12 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

13 165. Plaintiffs are informed and believe, and thereon allege, that defendant Joy Lujan is
14 a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
15 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
16 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
17 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

18 166. Plaintiffs are informed and believe and thereon allege that Defendant Brittany
19 MacKay is a resident of the State of Nevada. Defendant has, through counsel, asserted or
20 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
21 Las Vegas, Nevada.

22 167. Plaintiffs are informed and believe, and thereon allege, that defendant Keri Maher
23 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
24 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
25 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
26 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

27 168. Plaintiffs are informed and believe and thereon allege that Defendant Christian
28 Marquez is a resident of the State of Nevada. Defendant has, through counsel, asserted or

1 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
2 Las Vegas, Nevada.

3 169. Plaintiffs are informed and believe, and thereon allege, that defendant Traci
4 Marshall is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
5 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
6 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
7 filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

8 170. Plaintiffs are informed and believe, and thereon allege, that defendant Richard
9 Masucci is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
10 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
11 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
12 filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

13 171. Plaintiffs are informed and believe, and thereon allege, that defendant Lindsey
14 Mata is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
15 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
16 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,
17 filed January 4, 2018, in the Clark County District Court ("Clark County"), case number A-18-
18 767288-C.

19 172. Plaintiffs are informed and believe, and thereon allege, that defendant Travis
20 Matheson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
21 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
22 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
23 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number
24 BC684047.

25 173. Plaintiffs are informed and believe, and thereon allege, that defendant Steve McBee
26 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 174. Plaintiffs are informed and believe and thereon allege that Defendant Denise
3 McClellan is a resident of the State of Nevada. Defendant has, through counsel, asserted or
4 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
5 Las Vegas, Nevada.

6 175. Plaintiffs are informed and believe, and thereon allege, that defendant Lonnie
7 McCorvey is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
8 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
9 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
10 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
11 BC684047.

12 176. Plaintiffs are informed and believe, and thereon allege, that defendant Lynne
13 McCue is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
14 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
15 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,
16 filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-18-
17 767288-C.

18 177. Plaintiffs are informed and believe, and thereon allege, that defendant Tamika
19 McGill is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23 178. Plaintiffs are informed and believe and thereon allege that Defendant Carmen
24 McKinley is a resident of the State of Nevada. Defendant has, through counsel, asserted or
25 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
26 Las Vegas, Nevada.

27 179. Plaintiffs are informed and believe, and thereon allege, that defendant Cleveland
28 McMath is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was

1 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
2 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *McMath v. MGM*, filed
3 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-
4 764720-C.

5 180. Plaintiffs are informed and believe, and thereon allege, that defendant Doreen
6 Medina is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
9 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

10 181. Plaintiffs are informed and believe and thereon allege that Defendant Treza
11 Mekhail is a resident of the State of Nevada. Defendant has, through counsel, asserted or
12 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
13 Las Vegas, Nevada.

14 182. Plaintiffs are informed and believe, and thereon allege, that defendant Paige
15 Melanson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
16 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
17 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v.*
18 *MGM*, filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-
19 18-767288-C.

20 183. Plaintiffs are informed and believe, and thereon allege, that defendant Rosemarie
21 Melanson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
22 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
23 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v.*
24 *MGM*, filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-
25 18-767288-C.

26 184. Plaintiffs are informed and believe, and thereon allege, that defendant Stephanie
27 Melanson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
28 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims

1 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v.*
2 *MGM*, filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-
3 18-767288-C.

4 185. Plaintiffs are informed and believe, and thereon allege, that defendant Stephen
5 Melanson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
6 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
7 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v.*
8 *MGM*, filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-
9 18-767288-C.

10 186. Plaintiffs are informed and believe, and thereon allege that on October 1, 2017,
11 decedent Austin Meyer, was a resident of the State of Nevada. Plaintiffs are informed and believe
12 and thereon allege that Defendant, the Estate of Austin Meyer, has, through counsel, made claims
13 against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada, or,
14 alternatively, has indicated an intent to make such claims in the future (such as by way of the
15 filing of a separate lawsuit – now dismissed, by way of a letter of representation of counsel, or by
16 way of an evidence preservation letter from counsel).

17 187. Plaintiffs are informed and believe, and thereon allege, that defendant Romeo
18 Meyer is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
19 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
20 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
21 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

22 188. Plaintiffs are informed and believe, and thereon allege, that defendant Robert
23 Miller is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
24 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
25 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
26 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

27 189. Plaintiffs are informed and believe, and thereon allege, that defendant Phyllyssa
28 Montoya is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was

1 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
2 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
3 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

4 190. Plaintiffs are informed and believe, and thereon allege, that defendant Alyssa
5 Moore is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
6 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
7 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
8 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

9 191. Plaintiffs are informed and believe and thereon allege that Defendant Katrina
10 Morgan is a resident of the State of Nevada. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 192. Plaintiffs are informed and believe, and thereon allege, that defendant Shancela
14 Myers is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
15 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
16 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
17 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

18 193. Plaintiffs are informed and believe, and thereon allege, that defendant Marirose
19 Naing is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23 194. Plaintiffs are informed and believe, and thereon allege, that defendant Anthony
24 Don E. Noarbe is a resident of the State of Nevada. Defendant has previously filed a lawsuit
25 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting
26 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*
27 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
28 BC684047.

1 195. Plaintiffs are informed and believe, and thereon allege, that defendant Amber
2 Norcia is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6 196. Plaintiffs are informed and believe and thereon allege that Defendant Elsa Nunez is
7 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
8 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

9 197. Plaintiffs are informed and believe, and thereon allege, that defendant Rose
10 O’Toole is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
11 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
12 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
13 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

14 198. Plaintiffs are informed and believe, and thereon allege, that defendant Kuulei Otis
15 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
16 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
17 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
18 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

19 199. Plaintiffs are informed and believe and thereon allege that Defendant Stacie Owens
20 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
21 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
22 Nevada.

23 200. Plaintiffs are informed and believe and thereon allege that Defendant Chad Packard
24 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
25 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
26 Nevada.

27 201. Plaintiffs are informed and believe, and thereon allege, that defendant Kaycee Paul
28 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was

1 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
2 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
3 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

4 202. Plaintiffs are informed and believe, and thereon allege, that defendant Elisa Perez is
5 a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
6 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
7 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
8 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

9 203. Plaintiffs are informed and believe, and thereon allege, that defendant Angela
10 Marie Perry is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
11 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
12 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
13 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
14 BC684047.

15 204. Plaintiffs are informed and believe, and thereon allege, that defendant Jeremy
16 Pickett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
17 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
18 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
19 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

20 205. Plaintiffs are informed and believe, and thereon allege, that defendant Jose Plaza is
21 a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
22 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
23 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
24 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

25 206. Plaintiffs are informed and believe, and thereon allege, that defendant Mackenzie
26 Pluta is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 207. Plaintiffs are informed and believe, and thereon allege, that defendant Darrian
3 Porter is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
4 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
5 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
6 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

7 208. Plaintiffs are informed and believe and thereon allege that Defendant Laura A.
8 Puglia is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
9 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
10 Nevada.

11 209. Plaintiffs are informed and believe, and thereon allege, that defendant Karmjit Raju
12 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16 210. Plaintiffs are informed and believe and thereon allege that Defendant Jasmine Rein
17 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
18 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
19 Nevada.

20 211. Plaintiffs are informed and believe, and thereon allege, that defendant Stanley
21 Rendon is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
22 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
23 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Spencer, et al. v. Paddock*,
24 filed October 17, 2017, in Los Angeles Superior Court (“LASC”), case number BC680065.

25 212. Plaintiffs are informed and believe and thereon allege that Defendant Lea
26 Richmond is a resident of the State of Nevada. Defendant has, through counsel, asserted or
27 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
28 Las Vegas, Nevada.

1 213. Plaintiffs are informed and believe, and thereon allege, that defendant Israel Rivera
2 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6 214. Plaintiffs are informed and believe and thereon allege that Defendant Tonia
7 Rocheleau is a resident of the State of Nevada. Defendant has, through counsel, asserted or
8 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
9 Las Vegas, Nevada.

10 215. Plaintiffs are informed and believe and thereon allege that Defendant Michael
11 Rolland is a resident of the State of Nevada. Defendant has, through counsel, asserted or
12 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
13 Las Vegas, Nevada.

14 216. Plaintiffs are informed and believe and thereon allege that Defendant Mark Russell
15 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
16 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
17 Nevada.

18 217. Plaintiffs are informed and believe, and thereon allege, that defendant Vincent
19 Sager is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
22 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

23 218. Plaintiffs are informed and believe and thereon allege that Defendant Christopher
24 Salinas is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
25 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
26 Nevada.

27 219. Plaintiffs are informed and believe, and thereon allege, that defendant Lenea
28 Sampson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was

1 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
2 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Sampson v. MGM*, filed
3 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-
4 764733-C.

5 220. Plaintiffs are informed and believe and thereon allege that Defendant Alyssa Sands
6 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
7 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
8 Nevada.

9 221. Plaintiffs are informed and believe, and thereon allege, that defendant Joseph Sartin
10 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
11 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
12 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
13 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

14 222. Plaintiffs are informed and believe, and thereon allege, that defendant Sarah
15 Scarlett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
16 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
17 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
18 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

19 223. Plaintiffs are informed and believe, and thereon allege, that defendant Shawn
20 Scarlett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
21 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
22 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
23 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

24 224. Plaintiffs are informed and believe, and thereon allege, that defendant Shaylenne
25 Scarlett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
26 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
27 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
28 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

1 225. Plaintiffs are informed and believe and thereon allege that Defendant Kim Schmitz
2 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
3 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 226. Plaintiffs are informed and believe and thereon allege that Defendant Alison
6 Sheehe is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
7 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
8 Nevada.

9 227. Plaintiffs are informed and believe, and thereon allege, that defendant Christopher
10 Shuemaker is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
11 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
12 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
13 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
14 BC684047.

15 228. Plaintiffs are informed and believe, and thereon allege, that defendant Breanna
16 Skagen is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
17 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
18 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
19 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

20 229. Plaintiffs are informed and believe and thereon allege that Defendant Jennifer Skoff
21 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
22 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
23 Nevada.

24 230. Plaintiffs are informed and believe, and thereon allege, that defendant Cheyenne
25 Sloan is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
26 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
27 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,
28 filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-18-

1 767288-C.

2 231. Plaintiffs are informed and believe and thereon allege that Defendant Eden Smith is
3 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
4 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

5 232. Plaintiffs are informed and believe, and thereon allege, that defendant Jasper Smith
6 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
9 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

10 233. Plaintiffs are informed and believe, and thereon allege, that defendant Yvonne
11 Smith is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
12 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
13 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
14 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

15 234. Plaintiffs are informed and believe and thereon allege that Defendant Martin
16 Solano is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
17 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
18 Nevada.

19 235. Plaintiffs are informed and believe, and thereon allege, that defendant Shelby
20 Stalker is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
21 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
22 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,
23 filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-18-
24 767288-C.

25 236. Plaintiffs are informed and believe and thereon allege that Defendant Chris Stewart
26 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
27 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
28 Nevada.

1 237. Plaintiffs are informed and believe, and thereon allege, that defendant Gregory
2 Tavernite is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6 238. Plaintiffs are informed and believe and thereon allege that Defendant Sam Taylor is
7 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
8 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

9 239. Plaintiffs are informed and believe, and thereon allege, that defendant Wendy
10 Taylor-Hill is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
11 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
12 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
13 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
14 BC684047.

15 240. Plaintiffs are informed and believe, and thereon allege, that defendant Reginald
16 Tharps is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
17 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
18 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
19 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

20 241. Plaintiffs are informed and believe and thereon allege that Defendant Christina
21 Thebeau is a resident of the State of Nevada. Defendant has, through counsel, asserted or
22 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
23 Las Vegas, Nevada.

24 242. Plaintiffs are informed and believe, and thereon allege, that defendant David W.
25 Theriault is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
26 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
27 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
28 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

1 243. Plaintiffs are informed and believe, and thereon allege, that defendant Breyana
2 Thomas is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6 244. Plaintiffs are informed and believe, and thereon allege, that defendant Gabrielle
7 Thomas is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
8 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
9 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
10 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

11 245. Plaintiffs are informed and believe, and thereon allege, that defendant Savannah
12 Thomas is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
15 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

16 246. Plaintiffs are informed and believe, and thereon allege, that defendant Steven
17 Thome is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
18 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
19 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
20 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

21 247. Plaintiffs are informed and believe, and thereon allege, that defendant Alva Bruce
22 Tilley is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
23 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
24 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
25 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

26 248. Plaintiffs are informed and believe and thereon allege that Defendant Mariya Toro
27 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
28 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,

1 Nevada.

2 249. Plaintiffs are informed and believe, and thereon allege, that defendant Kathryn
3 Tressler is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
4 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
5 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Tressler v. MGM*, filed
6 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-
7 764722-C.

8 250. Plaintiffs are informed and believe, and thereon allege, that defendant Jennifer A.
9 Turner is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
10 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
11 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
12 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

13 251. Plaintiffs are informed and believe and thereon allege that Defendant Deborah
14 Urrizaga is a resident of the State of Nevada. Defendant has, through counsel, asserted or
15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
16 Las Vegas, Nevada.

17 252. Plaintiffs are informed and believe, and thereon allege, that defendant William F.
18 Vanderveer is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
19 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
20 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
21 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
22 BC684047.

23 253. Plaintiffs are informed and believe, and thereon allege, that defendant Frank
24 Vealencis is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
25 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
26 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
27 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
28 BC684047.

1 254. Plaintiffs are informed and believe, and thereon allege, that defendant Tamara
2 Vealencis is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
3 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
4 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
5 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
6 BC684047.

7 255. Plaintiffs are informed and believe and thereon allege that Defendant Regina Viola
8 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
9 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
10 Nevada.

11 256. Plaintiffs are informed and believe, and thereon allege, that defendant Alyssa
12 Walker is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16 257. Plaintiffs are informed and believe, and thereon allege, that defendant Tikiesha
17 Wasp is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
18 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
19 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
20 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

21 258. Plaintiffs are informed and believe, and thereon allege, that defendant Donald
22 Welty is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
23 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
24 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
25 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

26 259. Plaintiffs are informed and believe, and thereon allege, that defendant Zachary
27 Wilcox is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
28 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising

1 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
2 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

3 260. Plaintiffs are informed and believe, and thereon allege, that defendant Jordan
4 Wilkinson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
5 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
6 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
7 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
8 BC684047.

9 261. Plaintiffs are informed and believe, and thereon allege, that defendant Jeffery
10 Williams is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
11 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
12 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
13 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

14 262. Plaintiffs are informed and believe, and thereon allege, that defendant Teracio
15 Williams is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
16 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
17 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
18 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

19 263. Plaintiffs are informed and believe, and thereon allege, that defendant Gary “Opie”
20 Allen Wise is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
21 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
22 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
23 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
24 BC684047.

25 264. Plaintiffs are informed and believe, and thereon allege, that defendant John Yonts
26 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 265. Plaintiffs are informed and believe and thereon allege that Defendant Jamie Zaleski
3 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
4 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
5 Nevada.

6 266. Plaintiffs are informed and believe and thereon allege that Defendant Janet
7 Zmyewski is a resident of the State of Nevada. Defendant has, through counsel, asserted or
8 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
9 Las Vegas, Nevada.

10 267. Plaintiffs are informed and believe and thereon allege that Defendant Thomas
11 Zmyewski is a resident of the State of Nevada. Defendant has, through counsel, asserted or
12 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
13 Las Vegas, Nevada.

14 **JURISDICTION AND VENUE**

15 268. This Court has subject-matter jurisdiction pursuant to 28 U.S.C. § 1331 and 6
16 U.S.C. §442(a). As alleged hereinabove, the SAFETY Act expressly provides for original and
17 exclusive federal jurisdiction over actions arising from or relating to acts of mass violence where
18 technologies or services certified by the Secretary of Homeland Security were deployed. At the
19 time of Paddock’s mass attack at the Route 91 concert, security services were provided by
20 Contemporary Services Corporation as the Security Vendor for the Route 91 Harvest Festival.
21 CSC’s security services were certified by the Secretary of Homeland Security under the SAFETY
22 Act.

23 269. This Court has personal jurisdiction over Defendants because they are residents of
24 the State of Nevada and are therefore subject to the general personal jurisdiction of this Court.

25 270. Venue is proper in this Judicial District pursuant to 28 U.S.C.
26 § 1391(b)(1) because one or more of the Defendants are known to reside, or upon information and
27 belief, do reside, within this Judicial District.

FIRST CAUSE OF ACTION FOR DECLATORY RELIEF

(By Plaintiffs against all Defendants)

271. Plaintiffs reallege and incorporate by reference, as though fully set forth, the allegations of paragraphs 1-270, above.

272. Following Paddock's mass attack on the concert, over 2,500 individuals have either sued the MGM Parties, or threatened to sue the MGM Parties, for claims alleged to arise from or relate to the attack. Several hundred individuals filed suit, and before the issues could be joined or resolved, they dismissed their claims, apparently with the intent of refileing.

273. Each Defendant either (a) has previously filed suit (and then dismissed it) against one or more of the MGM Parties relating to the Paddock attack, or (b) through counsel has stated an intention to sue the MGM Parties relating to the attack. There is no pending litigation between Plaintiffs and Defendants relating to the attack.

274. The claims alleged in the now-dismissed lawsuits include claims of alleged negligence by the MGM Parties and others, including CSC, in protecting and safeguarding persons including those Defendants who attended the Route 91 Festival.

275. Defendants' actual and threatened lawsuits implicate the services provided by CSC because they implicate security at the concert, including training, emergency response, evacuation and adequacy of egress.

276. These claims are subject to the SAFETY Act, because (a) they arise from and relate to an act of mass violence meeting the statutory requirements; (b) CSC provided security at the concert, deploying services certified by the Department of Homeland Security under the SAFETY Act to protect against or respond to such an attack; and (c) the claims may therefore result in loss to CSC as the “Seller” of such certified services.

277. The claims threatened against the MGM Parties by certain Defendants, through counsel, also inevitably fall under the SAFETY Act for the very same reasons: (a) they arise from and relate to an act of mass violence meeting the statutory requirements; (b) CSC provided security at the concert, deploying services certified by the Department of Homeland Security under the SAFETY Act to protect against or respond to such an attack; and (c) the claims may

1 therefore result in loss to CSC as the “Seller” of such certified services. If Defendants were injured
2 by Paddock’s assault, as they allege, they were inevitably injured both because Paddock fired from
3 his window *and* because they remained in the line of fire at the concert. Such claims inevitably
4 implicate security at the concert—and may result in loss to CSC.

5 278. The SAFETY Act applies to claims “arising out of, relating to, or resulting from an
6 act of terrorism.”

7 279. The SAFETY Act defines an act of terrorism: An act meets the requirements if the
8 act is (i) “unlawful” (ii) “causes harm to a person ... in the United States,” and (iii) “uses or
9 attempts to use ... weapons ... designed or intended to cause mass ... injury.” 6 U.S.C. §
10 444(2)(B). There is no requirement in the statute or regulations of an ideological motive or
11 objective for the attack for it to meet the requirements of the SAFETY Act.

12 280. Paddock’s mass attack satisfies the requirements of the SAFETY Act and the
13 regulations: (i) it was “unlawful,” (ii) it resulted in death or injury to hundreds of persons in the
14 United States, and (iii) it involved weapons and other instrumentalities that were designed and
15 intended to cause, and which in fact caused, mass injury and death. Those weapons and
16 instrumentalities included rifles modified with bump stocks to spray fully automatic gun fire;
17 high-capacity magazines capable of holding between 60 and 100 rounds; and illegal incendiary
18 rounds intended to blow up the fuel tanks adjacent to the concert. Paddock used these weapons
19 and instrumentalities to fire hundreds of rounds at the crowd, and he fired incendiary rounds
20 which struck the fuel tanks but, fortunately, missed the fuel.

21 281. The post-attack investigation revealed that Paddock brought in his van, which he
22 parked in the hotel garage, 90 pounds of explosives, consisting of 20 two-pound containers of
23 exploding targets, 10 one-pound containers of exploding targets and 2 twenty-pound bags of
24 explosive precursors.

25 282. No MGM Party attempted to commit, knowingly participated in, aided, abetted,
26 committed, or participated in any conspiracy to commit any act of terrorism of criminal act related
27 to mass attack perpetrated by Stephen Paddock at the Route 91 Harvest Festival in Las Vegas,
28 Nevada, on October 1, 2017.

1 283. The Secretary of Homeland Security may make a determination that conduct in
2 question meets the statutory requirement, but neither the Act nor the regulations requires a formal
3 certification. The Statute provides that the Secretary shall have exclusive authority to certify
4 services, but the authority to determine whether an act of mass violence meets the statutory
5 requirements is not exclusive to the Secretary.

6 284. Public statements by the Secretary of Homeland Security concerning the attack
7 make clear that the attack meets the requirements of the SAFETY Act; indeed, based on the plain
8 language of the statute, the regulations, and the facts, no other determination could be possible.

9 285. In congressional testimony on November 30, 2017, the Acting Secretary of
10 Homeland Security noted the emphasis of “terrorists and other violent criminals ... on attacking
11 soft targets,” including “recent tragedies in Nevada.” The Acting Secretary went on to note that
12 the “SAFETY Act Program” “provide[s] critical incentives for the development and deployment
13 of anti-terrorism technologies by providing liability protections for ‘qualified anti-terrorism
14 technologies,’” which applies to a number of large sports and entertainment venues nationwide.

15 286. In a May 2018 release, Department of Homeland Security noted that “mass
16 shootings” in various places, including at a “concert,” aim “to kill and maim unsuspecting
17 individuals” and thereby fall within the Department’s “primary mission” “to prevent terrorist
18 attacks within the U.S, reduce the vulnerability of the U.S. to terrorism, and minimize the damage
19 and assist in the recovery from terrorist attacks that do occur, including those in ST-CPs [soft-
20 targets-crowded places].” Department of Homeland Security, *Soft Targets and Crowded Places*
21 *Security Plan Overview*, May 2018, at page 2. The report goes on to note that the protections of
22 the SAFETY Act have been “approved for open venues such as sports arenas and stadia” – such as
23 the venue for the Route 91 Festival. *Id.* at p. 17.

24 287. The Department continues its critical work to prevent and respond to mass
25 violence. In Congressional testimony on May 15, 2018, the Secretary testified that DHS is
26 “seeking to ramp up ‘soft target’ security efforts,” noting that DHS programs “address threats to
27 soft targets – including schools, *entertainment venues*, major events, and public spaces” (emphasis
28 added). Further, on June 4, 2018, DHS announced that it had “developed a ST-CP Security

Enhancement and Coordination Plan,” which has not been made public. The plan addresses “the increased emphasis *by terrorists* and other extremist actors to leverage less sophisticated methods to inflict harm in public areas ... such as parks, ... *special event venues*, and similar facilities.”

See <https://www.dhs.gov/publication/securing-soft-targets-and-crowded-spaces> (emphasis added).

288. The SAFETY Act creates a single, exclusive federal cause of action for claims for injuries arising out of or relating to acts of mass violence where services certified by the Department of Homeland Security were deployed in defense against, response to, or recovery from such act and such claims result or may result in loss to the Seller.

289. Pursuant to the SAFETY Act, the Department of Homeland Security has certified the services provided by CSC. The DHS Certification recognizes CSC’s security services as appropriate for preventing and responding to acts of mass violence. 6 U.S.C. § 441; *see also* 48 C.F.R. § 50.201.

290. CSC’s security services Certified by DHS include “Physical Security”; “Access Control”; and “Crowd Management.”

291. CSC’s Certified Crowd Management Services include:

- “Awareness of venue-specific emergency response protocols and evacuation procedures to include emergency alert and mass-notification systems and sheltering procedures”;
- “Pre-event venue / event safety inspections”;
- “Facilitation of crowd movement during ingress, circulation, sheltering in place, emergency evacuations, and egress”;
- “Pre-event coordination and multi-agency collaboration with public safety agencies”;
- “Selection, vetting, and training of employees.”

292. As alleged above, CSC was employed as the Security Vendor for the Route 91 concert. CSC’s responsibilities at the Route 91 Harvest Festival included providing the following DHS Certified Services:

- “perimeter security, event access, festival grounds event security”;
- “Staff[ing] inner perimeter and gates”;

- 1 • “Protect[ing] against unauthorized access”;
- 2 • “early warning ... of perimeter breaches”;
- 3 • “Secur[ing] internal festival grounds”;
- 4 • “Patrol[ing] festival floor grounds and assist[ing] patrons with any security related
- 5 issues”;
- 6 • pre-event planning for “Security and Safety”;
- 7 • “Emergency response” and “evacuation,” including evacuation for “terrorist threat”
- 8 and “ensur[ing] that the exit routes and gates remain unobstructed.”

9 293. For the reasons set forth above, the SAFETY Act creates an exclusive cause of
 10 action for any claims arising out of relating to Paddock’s mass attack and such claims may result
 11 in loss to the Seller. Under the SAFETY Act, there “shall exist only one cause of action for loss
 12 of property, personal injury, or death. 6 C.F.R. 25.7 (d).

13 294. Such cause of action “may be brought only against the Seller of the Qualified Anti-
 14 Terrorism Technology and may not be brought against the buyers, the buyer’s contractors, or
 15 downstream users of the Technology, the Seller’s suppliers or contractors, or any other person or
 16 entity.” 6 C.F.R. 25.7 (d). The SAFETY Act precludes any liability on the part of Plaintiffs to
 17 Defendants relating to Paddock’s mass attack.

18 295. In addition, the SAFETY Act provides that for any covered claims arising out of or
 19 relating to an act of mass violence where certified services were provided, “the government
 20 contractor defense applies in such a lawsuit,” which provides a complete defense to liability. 6
 21 U.S.C. 442(d)(1). The government contractor defense precludes any finding of liability on the part
 22 of Plaintiffs to Defendants relating to Paddock’s mass attack.

23 296. An actual and justiciable controversy exists between Plaintiffs and Defendants
 24 concerning the applicability of the SAFETY Act. Plaintiffs assert that the SAFETY Act precludes
 25 any liability for any claims arising out of or relating to Paddock’s mass attack, whereas, on
 26 information and belief, Defendants deny that the Act applies or that it precludes liability on their
 27 claims against Plaintiffs.

28 297. A judicial declaration as to whether the SAFETY Act applies and precludes

1 liability on Defendants' claims against the Plaintiffs is necessary at this time so that the parties
2 may ascertain their rights, and avoid the significant judicial waste that would occur if the lawsuits
3 were allowed to proceed in the absence of a finding as to the applicability of the SAFETY Act.

4 **PRAYER FOR RELIEF**

5 WHEREFORE, Plaintiffs MGM Parties pray for judgment against Defendants, and each of
6 them, as follows:

- 7 1. For a judicial declaration that:
- 8 a. Defendants' claims arising from the attack by Stephen Paddock on October 1, 2017
9 in Las Vegas, Nevada are subject to and governed by the SAFETY Act, 6 U.S.C. §
10 441 et seq.;
- 11 b. the SAFETY Act precludes any finding of liability against Plaintiffs for any claim
12 for injuries arising out of or related to Paddock's mass attack, without prejudice to
13 Defendants' rights to pursue claims against the "Seller" under the Act, including to
14 obtain proceeds of insurance that any such Seller was required by the Act to
15 maintain;
- 16 c. Plaintiffs have no liability of any kind to Defendants, or any of them, arising from
17 the Paddock's mass attack; and
- 18 2. For such other and further legal or equitable relief as the Court deems just and proper.

19 DATED: July 13, 2018

PISANELLI BICE

20
21 By: /s/ James J. Pisanelli

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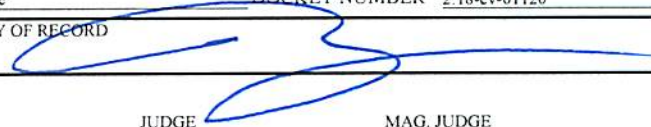
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Attorneys for Plaintiffs MGM RESORTS
INTERNATIONAL, MANDALAY RESORT GROUP,
MANDALAY BAY, LLC, MGM RESORTS
FESTIVAL GROUNDS, LLC, and MGM RESORTS
VENUE MANAGEMENT, LLC

JS 44 (Rev. 06/17)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS MGM RESORTS INTERNATIONAL, MANDALAY RESORT GROUP, MANDALAY BAY, LLC, MGM RESORTS FESTIVAL GROUNDS, LLC, and MGM RESORTS VENUE MANAGEMENT, LLC (b) County of Residence of First Listed Plaintiff <u>Clark County</u> (EXCEPT IN U.S. PLAINTIFF CASES) (c) Attorneys (Firm Name, Address, and Telephone Number)		DEFENDANTS CARLOS ACOSTA, EMMANUEAL AFFRAN, GREGE AGUAYO, LILLIAN AGUIRRE, DIONNDRA ALEXANDER, LESLIE ALSWORTH, ENRIQUE ARGUETA, SHANE ARMSTRONG, IMARI AUSBIE, TINA MARIE AVERY, JEFFREY BACHMAN, et al. County of Residence of First Listed Defendant <u>Clark County</u> (IN U.S. PLAINTIFF CASES ONLY) NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED. Attorneys (If Known)	
II. BASIS OF JURISDICTION (Place an "X" in One Box Only)		III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)	
<input type="checkbox"/> 1 U.S. Government Plaintiff	<input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)	Citizen of This State <input type="checkbox"/> 1 <input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State <input type="checkbox"/> 4 <input type="checkbox"/> 4
<input type="checkbox"/> 2 U.S. Government Defendant	<input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	Citizen of Another State <input type="checkbox"/> 2 <input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State <input type="checkbox"/> 5 <input type="checkbox"/> 5
IV. NATURE OF SUIT (Place an "X" in One Box Only)		Click here for: Nature of Suit Code Descriptions.	
CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	FORFEITURE/PENALTY <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	OTHER STATUTES <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
V. ORIGIN (Place an "X" in One Box Only)			
<input checked="" type="checkbox"/> 1 Original Proceeding <input type="checkbox"/> 2 Removed from State Court <input type="checkbox"/> 3 Remanded from Appellate Court <input type="checkbox"/> 4 Reinstated or Reopened <input type="checkbox"/> 5 Transferred from Another District (specify) <input type="checkbox"/> 6 Multidistrict Litigation - Transfer <input type="checkbox"/> 8 Multidistrict Litigation - Direct File			
VI. CAUSE OF ACTION		Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 U.S.C. §§ 2201 and 2202 Brief description of cause: Declaratory judgment under 28 U.S.C. §§ 2201-02 that the Support Anti-Terrorism by Fostering Effective Technologies Act of 2002 ("SAFETY Act"), 6 U.S.C. §§ 441-44, applies, and that Plaintiffs cannot be held liable for deaths, injuries, or other damages arising from Stephen Paddock's attack.	
VII. REQUESTED IN COMPLAINT:		<input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ _____ CHECK YES only if demanded in complaint: JURY DEMAND: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
VIII. RELATED CASE(S) IF ANY (See instructions): JUDGE <u>Richard F. Boulware</u> DOCKET NUMBER <u>2:18-cv-01120</u>			
DATE <u>7/13/18</u> SIGNATURE OF ATTORNEY OF RECORD 			
FOR OFFICE USE ONLY RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____			

000059

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Nevada

MGM RESORTS INTERNATIONAL, MANDALAY RESORT)
GROUP, MANDALAY BAY, LLC, MGM RESORTS)
FESTIVAL GROUNDS, LLC, and MGM RESORTS VENUE)
MANAGEMENT, LLC)

Plaintiff(s)

v.

CARLOS ACOSTA, EMMANUEAL AFFRAN, GREGE)
AGUAYO, LILLIAN AGUIRRE, DIONNDRA ALEXANDER,)
LESLIE ALSWORTH, ENRIQUE ARGUETA, SHANE)
ARMSTRONG, IMARI AUSBIE, TINA MARIE AVERY, et al.)

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

000060

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

EXHIBIT 2

MGM Resorts International, et al. v. Carlos
Acosta, et al.

2:18-cv-01288-APG-PAL

First Amended Complaint for Declaratory
Relief

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16 Attorneys for Plaintiffs MGM RESORTS INTERNATIONAL, MANDALAY
17 RESORT GROUP, MANDALAY BAY, LLC, MGM RESORTS FESTIVAL
18 GROUNDS, LLC, and MGM RESORTS VENUE MANAGEMENT, LLC

19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

22 MGM RESORTS INTERNATIONAL,
23 MANDALAY RESORT GROUP, MANDALAY
24 BAY, LLC f/k/a MANDALAY CORP., MGM
RESORTS FESTIVAL GROUNDS, LLC, MGM
RESORTS VENUE MANAGEMENT, LLC

25 Plaintiffs,

26 vs.

27 CARLOS ACOSTA; EMMANUEL AFFRAN;
28 GREG AGUAYO; LILLIAN AGUIRRE;
DIONNDRA ALEXANDER; LESLIE

Case No. 2:18-cv-01288-APG-PAL

**FIRST AMENDED COMPLAINT
FOR DECLARATORY RELIEF**

1 ALWORTH; ENRIQUE ARGUETA; SHANE
 2 ARMSTRONG; IMARI AUSBIE; TINA
 3 MARIE AVERY; JEFFREY BACHMAN;
 4 JOSEPH I. BALAS; BREANNA GRACE
 5 FRANCL BALDRIDGE; MALINDA
 6 BALDRIDGE; COLE BALDWIN; PAUL
 7 BALFOUR; ALICIA BEATTY; ELIZABETH
 8 BEATTY; MATTHEW BEATTY; BRANDY
 9 BEAVER; BRANDON CHARLES BECKETT;
 10 TINA BEDARTES; CHICO BELSER; CHRISTI
 11 BERAN; KAREN BERNEY; JENNIFER L.
 12 BITHELL; RUSSELL BLECK; AARON
 13 BOUPHAPRASEUTH; JOSHUA BRADY;
 14 CHANDRA BRIDGES; CRAIG ALAN
 15 BROCKETT; DEBBIE BROCKETT; KALI
 16 BROCKETT; LEXIA BROCKETT; CAITLIN
 17 BRUNNER; ANDRE BRYANT; JORI
 18 BUCKLAND; TIFFANIE BUEHLER;
 19 ANTHONY BURNS; ANDRETTI CAGE;
 20 KIMBERLY CALDERON; EARLLITRA
 21 DANIELLE CARTER; ATHENA CASTILLA;
 22 SHAYLA CATALDO; TEQUELA CHAPPELL;
 23 SAVANNA CHASCO; DANNY CLUFF; GREG
 24 CLUFF; CODY COFFER; MARKIE COFFER;
 25 CONNIE D. COLEMAN; KIMBERLY
 26 COLLINS; SUE ANN CORNWELL; DANIEL
 27 CORTES; BRETT COSSAIRT; MANDI
 28 CROWDER; CHANELL CUELLAR; JUAN
 CUELLAR; RAINNA RUSK DAVIS;
 WHITNEY DAY; JOHN DEANE; RACHEL
 DELAPAZ; HANNAH DOMINGUEZ;
 JOMONT DOTTON; SANDRA DOUGLAS;
 MICHAEL DYER; HUGH JOSEPH DYER III;
 SONYA ESTERS; EMILY EVANS;
 MICHELLE EVANS; KRISTINA FALCO;
 CASSANDRA FIGGERS; DEANNA FINLEY;
 JUDITH FISHER; BRISTINA FLATT;
 KENNETH SHAYNE FLETCHER; BETH
 GALOFARO; WILLIAM GALVEZ; LACY
 GANN; DANA GETREU; COURTNEY
 GIBSON; JENNIFER GIBSON; MICHAEL
 MERCED GILARDINO; JIMMY GILMORE;
 TOMAS GONZALEZ; HEATHER GOOZE;
 MICHAEL GREENFIELD; JULIAN
 HAMILTON; ANGEL HANDLIN; DARREL
 HANDLIN; MATTHEW HANSEN; MICHAEL
 HANSSON; CAROL HARDEN; JUSTIN
 HARMAN; LAKHESHA HARRIS; TRINO
 HARRIS; JENNIFER HAUT; ELIZABETH
 HEFLEY; GABRIELLE HEMPHILL;
 WILLIAM HENNING; RICHARD CRAIG
 HERMANN; MARIO HERRERA;
 JACQUELYN HOFFING; MARCELLA
 HOFFMAN; BRITTANY HORTON; MEGAN
 IANNUZZI; LUCA ICLODEAN; DMOREA

1 JACKSON; JARON ANTHONY JAMERSON;
 ANGELINA JAMES; COREY JOHNSON;
 2 DEANDRE JOHNSON; JAYNELLE
 JOHNSON; JOHANNA JOHNSON; SARAH
 3 JOHNSON; EDGAR T. JONES; CHIQUANA
 JOSHUA; MYLES KALK; AUTUM
 4 KAPINKIN; JAWAUNDO W. KIMMONS;
 WILLIAM KING; NIKKOLE KNIGHT;
 5 ANGELL KNITTLE; ANNA KOPP; DAVID
 KRONBERG; LORI KRUMME; MARY LYNN
 6 KUEFFNER; ATHEA LAVIN; AMIAH LEE;
 ERIKA LEE; LISA LEE; NICK LEMAY;
 7 ALAN I. LEVITT; CHARLES LEXION;
 YOLANDA LIZARDO; GABRIELA
 8 LOMAGLIO; VICENTE LOPEZ; SHAWNA
 LOTT; JOSHUA LUIZ; JOY LUJAN;
 9 BRITTANY MACKAY; KERI MAHER;
 CHRISTIAN MARQUEZ; TRACI
 10 MARSHALL; RICHARD MASUCCI;
 LINDSEY MATA; TRAVIS MATHESON;
 11 STEVE MCBEE; DENISE MCCLELLAN;
 LONNIE MCCORVEY; LYNNE MCCUE;
 12 TAMIKA MCGILL; CARMEN MCKINLEY;
 CLEVELAND MCMATH; DOREEN MEDINA;
 13 TREZA MEKHAIL; PAIGE MELANSON;
 ROSEMARIE MELANSON; STEPHANIE
 14 MELANSON; STEPHEN MELANSON;
 ESTATE OF AUSTIN MEYER; ROMEO
 15 MEYER; ROBERT MILLER; PHYLYSSA
 MONTOKA; ALYSSA MOORE; KATRINA
 16 MORGAN; SHANCELA MYERS; MARIROSE
 NAING; ANTHONY DON E. NOARBE;
 17 AMBER NORCIA; ELSA NUNEZ; ROSE
 O'TOOLE; KUULEI OTIS; STACIE OWENS;
 18 CHAD PACKARD; KAYCEE PAUL; ELISA
 PEREZ; ANGELA MARIE PERRY; JEREMY
 19 PICKETT; JOSE PLAZA; MACKENZIE
 PLUTA; DARRIAN PORTER; LAURA A.
 20 PUGLIA; KARMJIT RAJU; JASMINE REIN;
 STANLEY RENDON; LEA RICHMOND;
 21 ISRAEL RIVERA; TONIA ROCHELEAU;
 MICHAEL ROLLAND; MARK RUSSELL;
 22 VINCENT SAGER; CHRISTOPHER
 SALINAS; LENEA SAMPSON; ALYSSA
 23 SANDS; JOSEPH SARTIN; SARAH
 SCARLETT; SHAWN SCARLETT;
 24 SHAYLENNE SCARLETT; KIM SCHMITZ;
 ALISON SHEEHE; CHRISTOPHER
 25 SHUEMAKER; BREANNA SKAGEN;
 JENNIFER SKOFF; CHEYENNE SLOAN;
 26 EDEN SMITH; JASPER SMITH; YVONNE
 SMITH; MARTIN SOLANO; SHELBY
 27 STALKER; CHRIS STEWART; GREGORY
 TAVERNITE; SAM TAYLOR; WENDY
 28 TAYLOR-HILL; REGINALD THARPS;

1 CHRISTINA THEBEAU; DAVID W.
 THERIAULT; BREYANA THOMAS;
 2 GABRIELLE THOMAS; SAVANNAH
 THOMAS; STEVEN THOME; ALVA BRUCE
 3 TILLEY; MARIYA TORO; KATHRYN
 TRESSLER; JENNIFER A. TURNER;
 4 DEBORAH URRIZAGA; WILLIAM F.
 VANDERVEER; FRANK VEALENCIS;
 5 TAMARA VEALENCIS; REGINA VIOLA;
 ALYSSA WALKER; TIKIESHA WASP;
 6 DONALD WELTY; ZACHARY WILCOX;
 JORDAN WILKINSON; JEFFERY
 7 WILLIAMS; TERACIO WILLIAMS; GARY
 "OPIE" ALLEN WISE; JOHN YONTS; JAMIE
 8 ZALESKI; JANET ZMYEWSKI; THOMAS
 ZMYEWSKI; ESSENCE ABNER; ALLEN
 9 AFSHARI; RAE N. AGUAYO; KHALED
 AHMED; NIKKI RENEE ANN ALIREZ;
 10 NADIA ALLIE; FRANK MICHAEL
 ANDERSON III; TRINA ANDRADE-KWIST;
 11 CASSIDY ANDREASON; JENNIFER
 ARELLANES; SAMANTA ARJUNE;
 12 ANDREW AYALA; JOSEPH L. BALAS;
 TANYA BANUELOS; AUDREY BAREHAM;
 13 KYLE BASOM; ROBERT ALTON BEAIRD;
 ANTONYO BELL; WENDY MARIE
 14 BENFORD; CARDELL BENSON JR.;
 DAMAEN BENTLEY; MALCOLM
 15 BISSEMBER; ED BOUCHER; JENNA
 BOYER; FILLISE BOYKIN; TIA BOYKIN;
 16 CARRIE ALLMEN BRADSHAW; JOCELYN
 BRADY; NICKEE BRANHAM-SKOFF;
 17 ROBERT J. BRICKMAN II; BILL BRINGOLD;
 NICHOLAS BRONAS; GREGORY BROWN;
 18 BRETT BRUCKNER; CELIA BRUNGHURST;
 ELIJAH BRUNGHURST; JAYCEON
 19 BRUNGHURST; REGINA BUI; DAVID LYNN
 BUNCH; WALTER BURCH; KAYLA BURDO;
 20 GEROGE BURGARD; ZACHARY BURKES;
 SHANNA BURRELL; SAMUEL CABASAG;
 21 RUSSELL CAHOY; NICHOLAS JOSEPH
 CAIN-CASEY; JAMIE CALVILLO; BEN
 22 CAREY; CHRISTINE CARIA; JANICE
 CARONE-HOWARD; DEONNA CARTER;
 23 ANTHONY CAVALLARO; WALTER M.
 CENTENO; ANGELICA CERVANTES;
 24 ANJENETTE CHENEY; PENNY CHENIER;
 DIANE CHRISTIAN; AUSTIN
 25 CHRISTIANSEN; ASHLEY BERNARD
 CHRISTMAS; MANUEL CIGARROA; GRACE
 26 CLAROS; JERMAINE COLQUITT; GLEN
 COONFIELD; DIANA CORRADI; TERI
 27 CRANEY; STEPHEN CRAWFORD; JUSTIN
 CREGAR; ANTHONY CRESPIN; EVELYN
 28 CRISP; JASPER CROSS; JOHN W.

1 CROWE JR.; CALLI DEE CURRY; RUTIA
 2 CURRY; KINGA DAJBUKAT; LATIEF
 3 DANIELS; JUANITTA DARLYNN; WALTER
 4 D. DAVENPORT; CARLETTA DAVIS; DIANE
 5 DAVIS; NICOLE DAVIS; QUINTIN DAVIS;
 6 WILLIAM ZENON DE ARMAS;
 7 KRYSTALYN DESOTO; ALFRED DEVAULT;
 8 CLEVELAND DICKERSON; JUANITA
 9 DILLARD; KATRINA DIMACALI; DAVID
 10 DOGAN; LISA ANN LELANIE DOMEN;
 11 HEATHER E. DONAT; LILIANA DONIS;
 12 JAQUASHIA DOUGLAS; LAUREEN
 13 DRIGHT; CYNTHIA MICHELLE DUARTE;
 14 CYNTHIA EAGLIN; ARTHUR T. EARL;
 15 CHRIS EASTMAN; JENNIFER ECKMANN;
 16 TIJUANA EDWARDS; DAMIAN K.
 17 EINBINDER; SALOFIITU EMANUELE;
 18 HEIDI FARNAM; LAUGHTON FELL;
 19 JOSHUA FENOGLIA; CLARENCE FISHER;
 20 LAURA FISTON; PRECIOUS FLOWERS;
 21 EVARICK FORD; JASON A. FORD; MINDY
 22 P. FOSTER; WILLIAM FOUNTAIN; GERALD
 23 FOWLER; MATTHEW FOX; AILEEN R.
 24 FRANKLYN; ERIC FRASER; LASHEA
 25 FRAZIER; NICOLE LYNN FRENCH;
 26 JEREMY FRIE; LISA FURMAN; MICHAEL
 27 GALASSO; BRIDGETT GALLOWAY; MIA
 28 GANTT; FRANKIE GARCIA; LISANDRA
 GARCIA; JOSE A. GARDUNO; OLIVER
 GARNICA; PAUL GEORGE JR.;
 CHARMAINE GERMANY; THOMAS
 GESCHREY; SELAM GHIRMAY; ERIKA
 GIESECKE; STEPHEN GILES; ATALIE
 GILLISON; BARBARA J. GODRON; DEL
 GOLDEN; KEOSHA GOLDMAN; AVERY
 GOLDSTON; NATALIE BRIDGES
 GOODRUM; TRACY L. GORMAN; CHERYL
 GRADY; MELVIN GRANT; KATRINA
 GRAVES; TAWNY GRAY; MARIO
 GRAYSON; DEANNA GRIESE; KIMBERLY
 GRIFFIS; RUDY GUARINO; JOEL D.
 GUZMAN; LEO HAIRSTON; MARTINEZ
 HALL; CODY WAYNE HANSEN;
 SAMANTHA HARB; ALICIA HARMON;
 DERRICK HARRIS; LATIESHA HARRIS;
 MANDI HARRIS; STACEY HARRIS; AMIR
 HASAN; TARA HASTINGS; MARTIN
 HATHCOCK; EDWARD R. HAZEN; SEAN
 HEALY; JOHN HEFLEY; ADALGISA
 HENNING; SUMER HENNING; DAMIAN
 HENRY; SHEELA L. HENRY; CARLY
 HENSCHER; SHAUNTEL HIBBITT; JORDAN
 HICKS; SHANNON HICKS; SUSAN HIMES;
 EBONEY NICOLE HINES; NATHAN
 HINRICHs; ABIGAIL HINTON; ADRIANA

1 HINTON; ALEXIS HINTON; AMBEAR
 HINTON; RICK HINTON; JENNIFER
 2 HOHNKE; DON HOLBROOK; JUNE
 HOLDREN; AMBER HOLM; RAVEN
 3 HOLMES; SHAUNTE HORTON;
 ABDIRAHMAN HOSAIN; MISTY HOUSE;
 4 DELOSE HOWARD; SVETLANA HUEY;
 BRITIN C. HUGHES; STEVE HUTCHASON;
 5 ANTHONY ISABEL; DEVONTA JACKSON;
 JOHN JENKINS; DAVIELL JOHNSON;
 6 LARONTAE JOHNSON; MALVIN JOHNSON;
 RENAE JOLLEY; JONIQUEKA JONES;
 7 LANNETTA JONES; BRIANA JOSEPH; JUAN
 JUAREZ; JOHN JULIAS; BRANDON
 8 KALAAUKAHI; RON KATZ; WALT KOYA
 KAYZEE; HEATHER KERR; JOSEPH
 9 KINDER; TARA KING; RICHARD KINGERY;
 CYNTHIA KITCHENS; JOSEPH KOCJAN;
 10 AMBRIZ LADSON; MIGUEL LAGOS;
 BRADLEY KENT LAGRO; MARTIN L.
 11 LANDERS; QUENTIN LATHAN; MICHAEL
 LEAHY; CHLOE LEBO; KATHRYN RENEE
 12 LECKIE; MAXIME LECOCQ; MHONAI LEE;
 YVONNE LEE; AITOR LEJARDI; CRYSTAL
 13 LEJARDI; TARA LEM-MONS; ALICIA
 LEONARD; SAMUEL LEUTY; ASHLEY
 14 BREANNA LEWIS; CAROLYN LIZAMA;
 CORINNE LOMAS; EILEEN LOPEZ;
 15 JAHAIIRA LOSEY; ZEKIEL LOSEY; JEREMY
 LOWERY; NICOLE LUCIANO; KAYLA
 16 MACIAS; CYNTHIA MAEVERS; WILLIAM
 MALONEY; ERIC MALTZ; WILLIAM
 17 MANCIANO; MICHELLE XANI MANGIBIN;
 SHIRLEY MANUS; DASHAUN MARSHALL;
 18 DONTÉ MARSHALL; HOLY ANGEL
 MARTINEZ; STEVEN MARTINEZ; LANA
 19 MATHIS; MONIQUE MAXEY; JAMIE
 MAXWELL; MOUSSA MBOUP; SZILVIA
 20 MCBRIDE; KEMMY MCCOY; JAMONTE
 MCCULLAR; SHIRLEY MCCURRY;
 21 TASHARA MCMULLEN; RAJAI J. MCNEILI;
 CHRISTIAN MCQUOWN; JAMIE
 22 MEDEIROS; JOVANNIE MEDIANO;
 KIDADA MEDINA; LAUREL
 23 MEEK; JANETTE MEJIA; JOSHUA MEJIA;
 IRERI MENDEZ-ALVAREZ; JOSE
 24 MENENDEZ; DARREN MERRIWEATHER;
 VANESSA MICHELS; JAROD MIELCAREK;
 25 JAZA'NA MILLER; JAZMIA MILLER;
 LEVELLE MILLS; KIMANI MITCHELL;
 26 LAZARO MONT-ROS; MARKEITH MOORE;
 DARRIN MOREMAN; GEORGIANNE MARIE
 27 MORGAN; SHAKIERA MORRIS; DEVONTE-
 AMIR MORRISON; LADARIUS MORRISON;
 28 VENUS MOSLEY; KYLIE D. MULCAHY;

1 SEAN P. MULLALY; MIA MUMFORD;
 ESTHER MUNOZ; DEANGELO MURILLO;
 2 RONALD MURRAY; RILEY MUSGRAVE;
 MACY MYERS; JOAN MYLES; MARK
 3 MYSZAK; MOHAMMAD NASSAR;
 GREGORY L. NELSON; CHAYLA NEPOTE;
 4 SANDY NGUYEN; ANNETTA NICHOLSON;
 LELA JEAN NORTON; TOBY NORWOOD;
 5 SAVANNA OCHOA; MFALME ODIE;
 ALICIA M. OLIVE; JENNA O'NEAL;
 6 DONALD ORLAN; ANNETTE OROZCO;
 NOEMI OROZCO; VICTOR ORSCHEL;
 7 TANNY OWENS; JOSEPH PACE; CARLOS
 PADILLA; BACARRI PAGE; BONNIE
 8 PALAZZOLA; NAOMI PANTIRU; NEPTALI
 PAREDES-FIGUEROA; CHAD PARISIEN;
 9 THOMASINA PARKER; YVETTE PARKER;
 BRIDGET PARKINGTON; BRITTNEY
 10 PARKINGTON; ALINA PARRISH;
 MICHELLE PEARSON; CHRISTOPHER C.
 11 PEIRCE; JAMES PELZ; KAYLA PEREZ;
 JEFFREY PERKINS; DURWIN PERRY JR.;
 12 SHARON PETTAWAY; CELINA PHEM;
 JEANNETTA POLITE; CORY POLIZZI;
 13 TYRESHA POLK; ANTONIO PONCIANO;
 TIFFANY RAECENE POPE; BEATRICE
 14 POTTER; DAVID PRECIADO; MARIA
 PRECIADO; DRAKE PRITCHETT;
 15 BRITTANY LYNN QUINTERO; RASHIDA
 RAINES; INA RAMIREZ; MARIA RAMIREZ;
 16 ROMMEL RAMOS; JIHAD RANDOLPH;
 PAULETTE RAPHAEL; OSCAR RAPIO;
 17 LAWRENCE RAYBUCK; PAULA JANE
 REID; KATHERINE RENFRO; GARLAND
 18 REYES; KIMBERLY RICHIE; MIKE
 RICHMEIER; CHAMIKA ROBERSON;
 19 DONTAE LAROI ROBINSON; MARGO
 ROBINSON; JOSETTE ROCHA; ANGELITA
 20 F. RODRIGUEZ; TONIA ROLAND;
 JANEANN ROLLINS; DESIREE RONDEAU;
 21 RAQUEL ROOKS; ANTAWN ROSS;
 TIRRELLE ROSS; ALLAN ROUSSEAU;
 22 SHIRLEY RUELAS; ANTHONY RUFO;
 STEVE SAGELY; HEATHER SALLAN; LISA
 23 KIM M. SAMMONS; PRINCESS SANTOS;
 MELISSA SAUCEDO; KATREE SAUNDERS;
 24 ALISSA SAVATH; EUGENE SCHAVERS;
 GLORIA J. SCHRYVER; SARA BETH
 25 SCHUSSLER; RODERICK RICO SCOTT;
 SYDNEY SHAVER; COREY SHIPP; JOE
 26 SHIPP; JOYCE SHIPP; TAMALA SIEGEL;
 JOHANNA SIMEON; GARY ELIOT
 27 SIMMONS; JUSTIN E. SIMMONS; FLEMING
 SMITH III; CALVIN SMITH; IMELDA
 28 SMITH; IYUNA SMITH; JOANEKA SMITH;

1 JOLANDA SMITH; LEVONNE SMITH; TINA
SMITH; ELIZABETH SOCCI; LISA
2 SOININEN; DAYSI M. SOLANO; ARMANDO
SOLIS JR.; ARMANDO SOLIS; STEVEN
3 SONNENBURG; KARLA SORROSA;
MICHELLE SOUZA; PASQUALE SPANO;
4 RONIKA SPEARS; SHERWIN ST. JOHN;
MICHAEL STALEY; SHANNAN STEARNS;
5 KENNETH STEWARD; CLARENCE
STOCKTON; VALERIE STOUT; VINCENT
6 SULLIVAN; LISA SULVETTA; JACK
SUMMERLIN; SHAWNA SUTTON; JOHN
7 SWAYZER; LARRY GORDON SWIFT;
MERON TADESSE; SHONTE TALLEY;
8 GRACIELA TAPIA; BETTY TAYLOR;
LAUREN D. TAYLOR; KELLIE TEDERMAN;
9 TREASURE TELLIS; DIANE THARPE;
CHRISTINA THOMAS; KARNESHA
10 THOMAS; BAILEY THOMPSON; KEELY
THOMPSON; ANGELA TODD; RICHARD
11 TOFFOLLA; TODD TOMLIN; RAFAEL
TORREGANO; QUINCY TORRES; ROSALIA
12 TORRES; VERONICA TORRES; JORDAN E.
TREMPER; COLIN TREVINO; FRANCESCA
13 TRUJILLO; ISABELLA TRUJILLO; SAMUEL
LEE TRUJILLO; MARYLOC TRUSHEL;
14 TANISHA TURNER; JANETTE A. URIBE;
SANDRA VELASQUEZ; EDGAR VICENTE;
15 ALMA DELIA VILLA; NJERI WADE;
AUTUMN WAKE; IMELDA WALKER;
16 KAMIA WALKER; LORI WALLER; MARIO
WALLER; PENISE WALLER; ALEX
17 WALTERS; ODJESSICA WARD; SHAWN
WASHBURN; DARNELL S. WATTS;
18 RANDALL WEBB; MARCUS WELLMAKER;
JUAN WESLEY; GLADYS WHITEHURST;
19 NICOLE WHITLOCK; WILLIAM WIEGER;
ANNIE WIGGINS; CHISCA WILEY; CRAIG
20 A. WILLIAMS; LEON WILLIAMS; NOAH
WILLIAMS; TERI WILLIAMS; JULIA
21 WILLIAMS-LONG; RINA WILLIAMSON;
L'TANYA WILSON; DONNA WILSON-
22 DEMMON; SARAH ANN WITTSTOCK;
ROBYN-LEE WOLCHYN; TAMMY WOLFE;
23 LATRICIA WOODS; NIKKI WOODS;
NISHON WOODS; SHAY WRIGHT; JOSHUA
24 WRZESINSK; ANDRE WYATT; MICHAEL
YANG; GERALD YEAGER; KENYA R.
25 YOUNG; ROYE YOUNG; VASSAR D.
YOUNG; JESSICA LAUREN ZETTERBERG,

26 DEFENDANTS.
27
28

INTRODUCTION

1
2 1. On October 1, 2017, Stephen Paddock carried out a mass attack at the Route 91
3 Harvest Festival in Las Vegas, Nevada.

4 2. Paddock intended to inflict mass injury, death and destruction. He killed
5 58 persons and injured some 500 others. Paddock's attack resulted in the highest number of
6 deaths of any mass shooting in the Nation's history.

7 3. Security for the concert was provided by Contemporary Services Corporation,
8 whose security services have been certified by the Secretary of Homeland Security for protecting
9 against and responding to acts of mass injury and destruction.

10 4. Recognizing the national interest in such events, and in the development and
11 deployment of services certified by the Secretary of Homeland Security to prevent and respond to
12 such events, Congress has provided original and exclusive federal jurisdiction for any claims of
13 injuries arising out of or relating to mass violence where services certified by the Department were
14 deployed.

15 5. Plaintiff MGM Resorts Festival Grounds, LLC owns and operates the Las Vegas
16 Village, at 3901 South Las Vegas Boulevard, Las Vegas, Nevada 89119, where the Route 91
17 Harvest Festival was held. Plaintiff Mandalay Bay, LLC owns and operates the Mandalay Bay
18 resort, which is adjacent to Las Vegas Village. Plaintiff MGM Resorts International is the parent
19 corporation, with an indirect 100% interest in Mandalay Bay, LLC, and MGM Resorts Festival
20 Grounds. Plaintiff MGM Resorts Venue Management, LLC is a Nevada limited liability
21 company.

22 6. Paddock carried out his mass attack on the concert from a room on the 32nd floor
23 of the Mandalay Bay resort.

24 7. Following Paddock's attack, over 2,500 individuals ("Claimants") have brought
25 lawsuits, or threatened to bring lawsuits, against Plaintiffs MGM Resorts Festival Grounds, LLC,
26 MGM Resorts International, Mandalay Bay, LLC, Mandalay Resort Group, and MGM Resorts
27 Venue Management, LLC (collectively, "the MGM Parties"), alleging that the MGM Parties
28 (among others) are liable for deaths, injuries, and emotional distress resulting from Paddock's

1 attack. Claimants subsequently voluntarily dismissed these cases before they could be resolved,
2 apparently with the intent of refileing.

3 8. Named as defendants in this case are Claimants who have brought lawsuits (which
4 they subsequently voluntarily dismissed) against the MGM Parties, alleging claims arising from
5 Paddock's attack, and persons who, through counsel, have threatened to bring such claims against
6 the MGM Parties.

7 9. Congress has enacted legislation to support the development of new technologies
8 and services to prevent and respond to mass violence. That legislation, the Support
9 Anti-Terrorism by Fostering Effective Technologies Act of 2002, 6 U.S.C. §§ 441-444 (also
10 known by the acronym, the "SAFETY Act"), provides a calibrated balance of remedies and
11 limitations on liabilities arising from mass attacks committed on U.S. soil where services certified
12 by the Department of Homeland Security were deployed.

13 10. In the case of Paddock's mass attack, certified technologies or services were
14 deployed by a professional security company, Contemporary Services Corporation ("CSC"),
15 which was employed as the Security Vendor for the Route 91 concert. As alleged in more detail
16 below, Paddock's mass attack meets the requirements of the SAFETY Act as set forth in the
17 statute and the Regulations promulgated by the Department of Homeland Security.

18 11. Defendants' actual and threatened lawsuits implicate the services provided by CSC
19 because they implicate security at the concert, for example security training, emergency response,
20 evacuation, and adequacy of egress.

21 12. As a result, the SAFETY Act applies to and governs all actions and any claims
22 arising out of or relating to Paddock's mass attack. There are five key aspects of the Act and
23 implementing regulations promulgated by the Department of Homeland Security as authorized and
24 contemplated by the SAFETY Act. 6 C.F.R. § 25.1 et seq.

25 13. First, the SAFETY Act creates a "Federal cause of action for claims arising out of
26 [or] relating to" an act of mass violence where certified services were deployed and where such
27 claims may result in losses to the Seller of the services. 6 U.S.C. § 442(a)(1).

1 14. Second, the SAFETY Act expressly provides the federal courts with “original and
2 exclusive jurisdiction over all actions for any claim for loss” arising out of or related to such an
3 attack. 6 U.S.C. § 442(a)(2).

4 15. Third, as confirmed by the Secretary’s implementing regulations promulgated after
5 enactment of the SAFETY Act, the federal cause of action created by the statute is the exclusive
6 claim available in such circumstances. 6 U.S.C. § 442(a)(1). The regulations state: “There shall
7 exist only one cause of action for loss of property, personal injury, or death for performance or
8 non-performance of the Seller’s Qualified Anti-Terrorism Technology in relation to an Act of
9 Terrorism.” 6 C.F.R. § 25.7(d).

10 16. Fourth, the regulations further provide that “Such cause of action may be brought
11 only against the Seller of the Qualified Anti-Terrorism Technology and may not be brought
12 against the buyers, the buyers’ contractors, or downstream users of the Technology, the Seller’s
13 suppliers or contractors, or any other person or entity.” 6 C.F.R. § 25.7(d).

14 17. Fifth, to ensure compensation for victims in appropriate cases, the SAFETY Act
15 requires that the Seller “obtain liability insurance of such types and in such amounts as shall be
16 required in accordance with this section and certified by the Secretary to satisfy otherwise
17 compensable third-party claims arising out of, relating to, or resulting from an act of terrorism.”
18 6 U.S.C. § 443(a)(1).

19 18. Congress enacted the SAFETY Act in recognition of the strong national interest in
20 encouraging the development and use of technologies and services that can help prevent and
21 respond to mass violence. The Act does so in part by assurance of limited liability in the
22 unfortunate event that an incident of mass violence occurs and injuries occur despite the
23 deployment of such technology. The Act also does so by creating original and exclusive
24 jurisdiction for the resolution of all controversies in federal court. 6 U.S.C. § 442(a)(2).

25 19. The SAFETY Act expressly provides the federal courts with original and exclusive
26 jurisdiction over “all actions for and any claims for loss [or] injury” arising out of or relating to a
27 mass attack where certified services were provided and where such claims *may* result in losses to
28

1 the seller of those services. The Act and the associated regulations make clear that any such claim
2 against the MGM Parties must be dismissed.

3 20. By this action, the MGM Parties seek a declaratory judgment and further relief
4 pursuant to the Declaratory Judgment Act, 28 U.S.C. §§ 2201 and 2202, that the MGM parties
5 cannot be held liable to Defendants for deaths, injuries, or other damages arising from Paddock's
6 attack.

7 **PARTIES**

8 **A. PLAINTIFFS**

9 21. Plaintiff MGM RESORTS INTERNATIONAL is a Delaware corporation with its
10 principal place of business in Las Vegas, Nevada.

11 22. Plaintiff MANDALAY RESORT GROUP is a Nevada corporation with its
12 principal place of business in Las Vegas, Nevada.

13 23. Plaintiff, MANDALAY BAY, LLC f/k/a MANDALAY CORP. is a Nevada
14 limited liability company with a single member, Mandalay Resort Group.

15 24. Plaintiff MGM RESORTS FESTIVAL GROUNDS, LLC is a Nevada limited
16 liability company with a single member, Mandalay Resort Group.

17 25. Plaintiff MGM RESORTS VENUE MANAGEMENT, LLC is a Nevada limited
18 liability company with a single member, MGM Resorts International.

19 **B. DEFENDANTS**

20 26. Plaintiffs are informed and believe, and thereon allege, that defendant Carlos
21 Acosta is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
22 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
23 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
24 filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

25 27. Plaintiffs are informed and believe, and thereon allege, that defendant Emmanuel
26 Affran is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
28

1 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
2 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

3 28. Plaintiffs are informed and believe and thereon allege that Defendant Greg Aguayo
4 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
5 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
6 Nevada.

7 29. Plaintiffs are informed and believe and thereon allege that Defendant Lillian
8 Aguirre is a resident of the State of Nevada. Defendant has, through counsel, asserted or
9 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
10 Las Vegas, Nevada.

11 30. Plaintiffs are informed and believe, and thereon allege, that defendant Dionndra
12 Alexander is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
13 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
14 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
15 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
16 BC684047.

17 31. Plaintiffs are informed and believe and thereon allege that Defendant Leslie
18 Alworth is a resident of the State of Nevada. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 32. Plaintiffs are informed and believe, and thereon allege, that defendant Enrique
22 Argueta is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
23 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
24 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
25 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

26 33. Plaintiffs are informed and believe, and thereon allege, that defendant Shane
27 Armstrong is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
28 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims

1 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Athena Castilla v.*
 2 *MGM*, filed October 18, 2017, in the Los Angeles Superior Court (“LASC”), case number
 3 BC680193.

4 34. Plaintiffs are informed and believe, and thereon allege, that defendant Imari Ausbie
 5 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 6 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 7 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 8 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

9 35. Plaintiffs are informed and believe, and thereon allege, that defendant Tina Marie
 10 Avery is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 11 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 12 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 13 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

14 36. Plaintiffs are informed and believe and thereon allege that Defendant Jeffrey
 15 Bachman is a resident of the State of Nevada. Defendant has, through counsel, asserted or
 16 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
 17 Las Vegas, Nevada.

18 37. Plaintiffs are informed and believe and thereon allege that Defendant Joseph I.
 19 Balas is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
 20 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
 21 Nevada.

22 38. Plaintiffs are informed and believe, and thereon allege, that defendant Breanna
 23 Grace Francel Baldridge is a resident of the State of Nevada. Defendant has previously filed a
 24 lawsuit (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs,
 25 asserting claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in
 26 *Baldridge, et al. v. MGM*, filed January 18, 2018, in Clark County District Court
 27 (“Clark County”), case number A-18-767981-C.

1 39. Plaintiffs are informed and believe, and thereon allege, that defendant Malinda
2 Baldridge is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
3 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
4 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Baldridge, et al. v.*
5 *MGM*, filed January 18, 2018, in Clark County District Court (“Clark County”),
6 case number A-18-767981-C.

7 40. Plaintiffs are informed and believe, and thereon allege, that defendant Cole
8 Baldwin is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
9 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
10 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
11 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

12 41. Plaintiffs are informed and believe and thereon allege that Defendant Paul Balfour
13 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
14 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
15 Nevada.

16 42. Plaintiffs are informed and believe and thereon allege that Defendant Alicia Beatty
17 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
18 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
19 Nevada.

20 43. Plaintiffs are informed and believe and thereon allege that Defendant Elizabeth
21 Beatty is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
22 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
23 Nevada.

24 44. Plaintiffs are informed and believe and thereon allege that Defendant Matthew
25 Beatty is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
26 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
27 Nevada.

1 45. Plaintiffs are informed and believe, and thereon allege, that defendant Brandy
2 Beaver is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6 46. Plaintiffs are informed and believe, and thereon allege, that defendant Brandon
7 Charles Beckett is a resident of the State of Nevada. Defendant has previously filed a lawsuit
8 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting
9 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham,*
10 *et al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”),
11 case number BC684047.

12 47. Plaintiffs are informed and believe and thereon allege that Defendant Tina Bedartes
13 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
14 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
15 Nevada.

16 48. Plaintiffs are informed and believe, and thereon allege, that defendant Chico Belser
17 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
18 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
19 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
20 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

21 49. Plaintiffs are informed and believe, and thereon allege, that defendant Christi Beran
22 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
23 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
24 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
25 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

26 50. Plaintiffs are informed and believe and thereon allege that Defendant Karen Berney
27 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
28

1 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
2 Nevada.

3 51. Plaintiffs are informed and believe, and thereon allege, that defendant Jennifer L.
4 Bithell is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
5 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
6 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
7 filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

8 52. Plaintiffs are informed and believe, and thereon allege, that defendant Russell
9 Bleck is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
10 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
11 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
12 filed December 15, 2017, in the Los Angeles Superior Court ("LASC"), case number BC687120.

13 53. Plaintiffs are informed and believe, and thereon allege, that defendant Aaron
14 Bouphapraseuth is a resident of the State of Nevada. Defendant has previously filed a lawsuit
15 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting
16 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*
17 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number
18 BC684047.

19 54. Plaintiffs are informed and believe and thereon allege that Defendant Joshua Brady
20 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
21 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
22 Nevada.

23 55. Plaintiffs are informed and believe, and thereon allege, that defendant Chandra
24 Bridges is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
25 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
26 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
27 filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

1 56. Plaintiffs are informed and believe, and thereon allege, that defendant Craig Alan
2 Brockett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6 57. Plaintiffs are informed and believe, and thereon allege, that defendant Debbie
7 Brockett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
8 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
9 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
10 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

11 58. Plaintiffs are informed and believe, and thereon allege, that defendant Kali Brockett
12 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16 59. Plaintiffs are informed and believe, and thereon allege, that defendant Lexia
17 Brockett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
18 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
19 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
20 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

21 60. Plaintiffs are informed and believe, and thereon allege, that defendant Caitlin
22 Brunner is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
23 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
24 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Brunner v. MGM*,
25 filed November 15, 2017, in the Clark County District Court (“Clark County”),
26 case number A-17-764745-C.

27 61. Plaintiffs are informed and believe, and thereon allege, that defendant Andre
28 Bryant is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was

1 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 2 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 3 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

4 62. Plaintiffs are informed and believe, and thereon allege, that defendant Jori
 5 Buckland is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 6 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 7 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Buckland v. MGM*,
 8 filed November 15, 2017, in the Clark County District Court (“Clark County”),
 9 case number A-17-764741-C.

10 63. Plaintiffs are informed and believe and thereon allege that Defendant Tiffanie
 11 Buehler is a resident of the State of Nevada. Defendant has, through counsel, asserted or
 12 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
 13 Las Vegas, Nevada.

14 64. Plaintiffs are informed and believe and thereon allege that Defendant Anthony
 15 Burns is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
 16 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
 17 Nevada.

18 65. Plaintiffs are informed and believe, and thereon allege, that defendant Andretti
 19 Cage is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23 66. Plaintiffs are informed and believe, and thereon allege, that defendant Kimberly
 24 Calderon is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 25 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 26 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v.*
 27 *MGM*, filed January 4, 2018, in the Clark County District Court (“Clark County”),
 28 case number A-18-767288-C.

67. Plaintiffs are informed and believe, and thereon allege, that defendant Earllitra Danielle Carter is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

68. Plaintiffs are informed and believe, and thereon allege, that defendant Athena Castilla is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Athena Castilla v. MGM*, filed October 18, 2017, in the Los Angeles Superior Court (“LASC”), case number BC680193.

69. Plaintiffs are informed and believe, and thereon allege, that defendant Shayla Cataldo is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Cataldo v. MGM*, filed November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-764738-C.

70. Plaintiffs are informed and believe, and thereon allege, that defendant Tequela Chappell is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

71. Plaintiffs are informed and believe and thereon allege that Defendant Savanna Chasco is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

72. Plaintiffs are informed and believe, and thereon allege, that defendant Danny Cluff is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was

1 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 2 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 3 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

4 73. Plaintiffs are informed and believe and thereon allege that Defendant Greg Cluff is
 5 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
 6 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

7 74. Plaintiffs are informed and believe and thereon allege that Defendant Cody Coffey
 8 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
 9 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
 10 Nevada.

11 75. Plaintiffs are informed and believe, and thereon allege, that defendant Markie
 12 Coffey is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16 76. Plaintiffs are informed and believe, and thereon allege, that defendant Connie D.
 17 Coleman is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 18 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 19 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Gasper, et al. v. MGM*, filed
 20 November 20, 2017, in Los Angeles Superior Court (“LASC”), case number BC684143

21 77. Plaintiffs are informed and believe, and thereon allege, that defendant Kimberly
 22 Collins is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 23 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 24 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 25 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

26 78. Plaintiffs are informed and believe and thereon allege that Defendant Sue Ann
 27 Cornwell is a resident of the State of Nevada. Defendant has, through counsel, asserted or
 28

1 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
2 Las Vegas, Nevada.

3 79. Plaintiffs are informed and believe, and thereon allege, that defendant Daniel
4 Cortes is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
5 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
6 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
7 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

8 80. Plaintiffs are informed and believe, and thereon allege, that defendant Brett
9 Cossairt is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
10 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
11 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
12 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

13 81. Plaintiffs are informed and believe and thereon allege that Defendant Mandi
14 Crowder is a resident of the State of Nevada. Defendant has, through counsel, asserted or
15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
16 Las Vegas, Nevada.

17 82. Plaintiffs are informed and believe and thereon allege that Defendant Chanell
18 Cuellar is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
19 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
20 Nevada.

21 83. Plaintiffs are informed and believe and thereon allege that Defendant Juan Cuellar
22 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
23 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
24 Nevada.

25 84. Plaintiffs are informed and believe, and thereon allege, that defendant Rainna Rusk
26 Davis is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
28

1 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 2 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

3 85. Plaintiffs are informed and believe and thereon allege that Defendant Whitney Day
 4 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
 5 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
 6 Nevada.

7 86. Plaintiffs are informed and believe and thereon allege that Defendant John Deane is
 8 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
 9 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

10 87. Plaintiffs are informed and believe, and thereon allege, that defendant Rachel
 11 DelaPaz is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 12 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 13 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 14 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

15 88. Plaintiffs are informed and believe, and thereon allege, that defendant Hannah
 16 Dominguez is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
 17 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
 18 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
 19 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”),
 20 case number BC684047.

21 89. Plaintiffs are informed and believe, and thereon allege, that defendant Jomont
 22 Dotton is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 23 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 24 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 25 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

26 90. Plaintiffs are informed and believe, and thereon allege, that defendant Sandra
 27 Douglas is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 28 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising

1 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 2 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

3 91. Plaintiffs are informed and believe, and thereon allege, that defendant Michael
 4 Dyer is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 5 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 6 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 7 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

8 92. Plaintiffs are informed and believe, and thereon allege, that defendant Hugh Joseph
 9 Dyer III is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 10 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 11 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 12 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

13 93. Plaintiffs are informed and believe, and thereon allege, that defendant Sonya Esters
 14 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 15 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 16 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 17 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

18 94. Plaintiffs are informed and believe and thereon allege that Defendant Emily Evans
 19 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
 20 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
 21 Nevada.

22 95. Plaintiffs are informed and believe, and thereon allege, that defendant Michelle
 23 Evans is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 24 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 25 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 26 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

27 96. Plaintiffs are informed and believe, and thereon allege, that defendant Kristina
 28 Falco is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was

1 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
2 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
3 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

4 97. Plaintiffs are informed and believe, and thereon allege, that defendant Cassandra
5 Figgers is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
6 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
7 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
8 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

9 98. Plaintiffs are informed and believe and thereon allege that Defendant Deanna
10 Finley is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
11 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
12 Nevada.

13 99. Plaintiffs are informed and believe, and thereon allege, that defendant Judith Fisher
14 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
15 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
16 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
17 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

18 100. Plaintiffs are informed and believe, and thereon allege, that defendant Bristina Flatt
19 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23 101. Plaintiffs are informed and believe, and thereon allege, that defendant Kenneth
24 Shayne Fletcher is a resident of the State of Nevada. Defendant has previously filed a lawsuit
25 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting
26 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in
27 *Abraham, et al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”),
28 case number BC684047.

1 102. Plaintiffs are informed and believe and thereon allege that Defendant Beth Galofaro
2 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
3 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 103. Plaintiffs are informed and believe, and thereon allege, that defendant William
6 Galvez is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
9 filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

10 104. Plaintiffs are informed and believe and thereon allege that Defendant Lacy Gann is
11 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
12 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

13 105. Plaintiffs are informed and believe and thereon allege that Defendant Dana Getreu
14 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
15 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
16 Nevada.

17 106. Plaintiffs are informed and believe, and thereon allege, that defendant Courtney
18 Gibson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
19 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
20 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
21 filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

22 107. Plaintiffs are informed and believe and thereon allege that Defendant Jennifer
23 Gibson is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
24 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
25 Nevada.

26 108. Plaintiffs are informed and believe, and thereon allege, that defendant Michael
27 Merced Gilardino is a resident of the State of Nevada. Defendant has previously filed a lawsuit
28 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting

1 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in
2 *Abraham, et al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”),
3 case number BC684047.

4 109. Plaintiffs are informed and believe and thereon allege that Defendant Jimmy
5 Gilmore is a resident of the State of Nevada. Defendant has, through counsel, asserted or
6 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
7 Las Vegas, Nevada.

8 110. Plaintiffs are informed and believe, and thereon allege, that defendant Tomas
9 Gonzalez is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
10 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
11 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
12 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

13 111. Plaintiffs are informed and believe, and thereon allege, that defendant Heather
14 Gooze is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
15 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
16 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Gooze v. MGM*, filed
17 November 15, 2017, in the Clark County District Court (“Clark County”),
18 case number A-17-764718-C.

19 112. Plaintiffs are informed and believe, and thereon allege, that defendant Michael
20 Greenfield is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
21 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
22 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v.*
23 *MGM*, filed December 15, 2017, in the Los Angeles Superior Court (“LASC”),
24 case number BC687120.

25 113. Plaintiffs are informed and believe, and thereon allege, that defendant Julian
26 Hamilton is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
28

1 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
2 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

3 114. Plaintiffs are informed and believe and thereon allege that Defendant Angel
4 Handlin is a resident of the State of Nevada. Defendant has, through counsel, asserted or
5 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
6 Las Vegas, Nevada.

7 115. Plaintiffs are informed and believe and thereon allege that Defendant Darrel
8 Handlin is a resident of the State of Nevada. Defendant has, through counsel, asserted or
9 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
10 Las Vegas, Nevada.

11 116. Plaintiffs are informed and believe, and thereon allege, that defendant Matthew
12 Hansen is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16 117. Plaintiffs are informed and believe and thereon allege that Defendant Michael
17 Hansson is a resident of the State of Nevada. Defendant has, through counsel, asserted or
18 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
19 Las Vegas, Nevada.

20 118. Plaintiffs are informed and believe, and thereon allege, that defendant Carol Harden
21 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
22 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
23 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
24 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

25 119. Plaintiffs are informed and believe and thereon allege that Defendant Justin
26 Harman is a resident of the State of Nevada. Defendant has, through counsel, asserted or
27 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
28 Las Vegas, Nevada.

1 120. Plaintiffs are informed and believe, and thereon allege, that defendant Lakhesha
2 Harris is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6 121. Plaintiffs are informed and believe, and thereon allege, that defendant Trino Harris
7 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
8 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
9 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
10 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

11 122. Plaintiffs are informed and believe, and thereon allege, that defendant Jennifer Haut
12 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16 123. Plaintiffs are informed and believe and thereon allege that Defendant Elizabeth
17 Hefley is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
18 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
19 Nevada.

20 124. Plaintiffs are informed and believe and thereon allege that Defendant Gabrielle
21 Hemphill is a resident of the State of Nevada. Defendant has, through counsel, asserted or
22 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
23 Las Vegas, Nevada.

24 125. Plaintiffs are informed and believe and thereon allege that Defendant William
25 Henning is a resident of the State of Nevada. Defendant has, through counsel, asserted or
26 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
27 Las Vegas, Nevada.

28

1 126. Plaintiffs are informed and believe, and thereon allege, that defendant Richard
 2 Craig Hermann is a resident of the State of Nevada. Defendant has previously filed a lawsuit
 3 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting
 4 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*
 5 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
 6 BC684047.

7 127. Plaintiffs are informed and believe, and thereon allege, that defendant Mario
 8 Herrera is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 9 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 10 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 11 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

12 128. Plaintiffs are informed and believe and thereon allege that Defendant Jacquelyn
 13 Hoffing is a resident of the State of Nevada. Defendant has, through counsel, asserted or
 14 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
 15 Las Vegas, Nevada.

16 129. Plaintiffs are informed and believe, and thereon allege, that defendant Marcella
 17 Hoffman is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 18 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 19 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 20 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

21 130. Plaintiffs are informed and believe, and thereon allege, that defendant Brittany
 22 Horton is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 23 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 24 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 25 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

26 131. Plaintiffs are informed and believe and thereon allege that Defendant Megan
 27 Iannuzzi is a resident of the State of Nevada. Defendant has, through counsel, asserted or
 28

1 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
 2 Las Vegas, Nevada.

3 132. Plaintiffs are informed and believe, and thereon allege, that defendant Luca
 4 Iclodean is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 5 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 6 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Iclodean v. MGM*, filed
 7 November 15, 2017, in the Clark County District Court (“Clark County”), case
 8 number A-17-764716-C.

9 133. Plaintiffs are informed and believe, and thereon allege, that defendant Dmorea
 10 Jackson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 11 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 12 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 13 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

14 134. Plaintiffs are informed and believe, and thereon allege, that defendant Jaron
 15 Anthony Jamerson is a resident of the State of Nevada. Defendant has previously filed a lawsuit
 16 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting
 17 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*
 18 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
 19 BC684047.

20 135. Plaintiffs are informed and believe, and thereon allege, that defendant Angelina
 21 James is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 22 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 23 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 24 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

25 136. Plaintiffs are informed and believe, and thereon allege, that defendant Corey
 26 Johnson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 28

1 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 2 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

3 137. Plaintiffs are informed and believe, and thereon allege, that defendant DeAndre
 4 Johnson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 5 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 6 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 7 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

8 138. Plaintiffs are informed and believe, and thereon allege, that defendant Jaynelle
 9 Johnson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 10 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 11 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 12 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

13 139. Plaintiffs are informed and believe, and thereon allege, that defendant Johanna
 14 Johnson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 15 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 16 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 17 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

18 140. Plaintiffs are informed and believe, and thereon allege, that defendant Sarah
 19 Johnson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23 141. Plaintiffs are informed and believe, and thereon allege, that defendant Edgar T.
 24 Jones is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
 25 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
 26 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
 27 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

1 142. Plaintiffs are informed and believe, and thereon allege, that defendant Chiquana
2 Joshua is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6 143. Plaintiffs are informed and believe and thereon allege that Defendant Myles Kalk is
7 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
8 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

9 144. Plaintiffs are informed and believe and thereon allege that Defendant Autum
10 Kapinkin is a resident of the State of Nevada. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 145. Plaintiffs are informed and believe, and thereon allege, that defendant Jawaundo W.
14 Kimmons is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
15 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
16 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
17 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
18 BC684047.

19 146. Plaintiffs are informed and believe, and thereon allege, that defendant William
20 King is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
21 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
22 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,
23 filed January 4, 2018, in the Clark County District Court (“Clark County”), case
24 number A-18-767288-C.

25 147. Plaintiffs are informed and believe and thereon allege that Defendant Nikkole
26 Knight is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
27 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
28 Nevada.

1 148. Plaintiffs are informed and believe, and thereon allege, that defendant Angell
2 Knittle is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6 149. Plaintiffs are informed and believe and thereon allege that Defendant Anna Kopp is
7 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
8 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

9 150. Plaintiffs are informed and believe, and thereon allege, that defendant David
10 Kronberg is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
11 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
12 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
13 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

14 151. Plaintiffs are informed and believe and thereon allege that Defendant Lori Krumme
15 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
16 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
17 Nevada.

18 152. Plaintiffs are informed and believe, and thereon allege, that defendant Mary Lynn
19 Kueffner is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23 153. Plaintiffs are informed and believe and thereon allege that Defendant Athea Lavin
24 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
25 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
26 Nevada.

27 154. Plaintiffs are informed and believe, and thereon allege, that defendant Amiah Lee is
28 a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was

1 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
2 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
3 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

4 155. Plaintiffs are informed and believe, and thereon allege, that defendant Erika Lee is
5 a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
6 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
7 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
8 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

9 156. Plaintiffs are informed and believe, and thereon allege, that defendant Lisa Lee is a
10 resident of the State of Nevada. Defendant has previously filed a lawsuit (which was subsequently
11 voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising from the
12 October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*, filed
13 November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

14 157. Plaintiffs are informed and believe, and thereon allege, that defendant Nick Lemay
15 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
16 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
17 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
18 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

19 158. Plaintiffs are informed and believe, and thereon allege, that defendant Alan I. Levitt
20 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
21 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
22 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Gasper, et al. v. MGM*, filed
23 November 20, 2017, in Los Angeles Superior Court (“LASC”), case number BC684143

24 159. Plaintiffs are informed and believe, and thereon allege, that defendant Charles
25 Lexion is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
26 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
27 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
28 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

1 160. Plaintiffs are informed and believe, and thereon allege, that defendant Yolanda
2 Lizardo is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6 161. Plaintiffs are informed and believe and thereon allege that Defendant Gabriela
7 Lomaglio is a resident of the State of Nevada. Defendant has, through counsel, asserted or
8 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
9 Las Vegas, Nevada.

10 162. Plaintiffs are informed and believe, and thereon allege, that defendant Vicente
11 Lopez is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
12 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
13 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
14 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

15 163. Plaintiffs are informed and believe, and thereon allege, that defendant Shawna Lott
16 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
17 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
18 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Lott v. MGM*, filed
19 November 15, 2017, in the Clark County District Court (“Clark County”), case
20 number A-17-764736-C.

21 164. Plaintiffs are informed and believe, and thereon allege, that defendant Joshua Luiz
22 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
23 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
24 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
25 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

26 165. Plaintiffs are informed and believe, and thereon allege, that defendant Joy Lujan is
27 a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
28 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising

1 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
2 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

3 166. Plaintiffs are informed and believe and thereon allege that Defendant Brittany
4 MacKay is a resident of the State of Nevada. Defendant has, through counsel, asserted or
5 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
6 Las Vegas, Nevada.

7 167. Plaintiffs are informed and believe, and thereon allege, that defendant Keri Maher
8 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
9 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
10 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
11 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

12 168. Plaintiffs are informed and believe and thereon allege that Defendant Christian
13 Marquez is a resident of the State of Nevada. Defendant has, through counsel, asserted or
14 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
15 Las Vegas, Nevada.

16 169. Plaintiffs are informed and believe, and thereon allege, that defendant Traci
17 Marshall is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
18 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
19 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
20 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

21 170. Plaintiffs are informed and believe, and thereon allege, that defendant Richard
22 Masucci is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
23 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
24 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
25 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

26 171. Plaintiffs are informed and believe, and thereon allege, that defendant Lindsey
27 Mata is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
28 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising

1 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,
2 filed January 4, 2018, in the Clark County District Court (“Clark County”), case
3 number A-18-767288-C.

4 172. Plaintiffs are informed and believe, and thereon allege, that defendant Travis
5 Matheson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
6 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
7 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
8 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
9 BC684047.

10 173. Plaintiffs are informed and believe, and thereon allege, that defendant Steve McBee
11 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
12 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
13 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
14 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

15 174. Plaintiffs are informed and believe and thereon allege that Defendant Denise
16 McClellan is a resident of the State of Nevada. Defendant has, through counsel, asserted or
17 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
18 Las Vegas, Nevada.

19 175. Plaintiffs are informed and believe, and thereon allege, that defendant Lonnie
20 McCorvey is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
21 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
22 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
23 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case
24 number BC684047.

25 176. Plaintiffs are informed and believe, and thereon allege, that defendant Lynne
26 McCue is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,

1 filed January 4, 2018, in the Clark County District Court (“Clark County”), case
2 number A-18-767288-C.

3 177. Plaintiffs are informed and believe, and thereon allege, that defendant Tamika
4 McGill is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
5 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
6 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
7 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

8 178. Plaintiffs are informed and believe and thereon allege that Defendant Carmen
9 McKinley is a resident of the State of Nevada. Defendant has, through counsel, asserted or
10 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
11 Las Vegas, Nevada.

12 179. Plaintiffs are informed and believe, and thereon allege, that defendant Cleveland
13 McMath is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
14 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
15 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *McMath v. MGM*, filed
16 November 15, 2017, in the Clark County District Court (“Clark County”), case
17 number A-17-764720-C.

18 180. Plaintiffs are informed and believe, and thereon allege, that defendant Doreen
19 Medina is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23 181. Plaintiffs are informed and believe and thereon allege that Defendant Treza
24 Mekhail is a resident of the State of Nevada. Defendant has, through counsel, asserted or
25 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
26 Las Vegas, Nevada.

27 182. Plaintiffs are informed and believe, and thereon allege, that defendant Paige
28 Melanson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which

1 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
2 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v.*
3 *MGM*, filed January 4, 2018, in the Clark County District Court (“Clark County”), case
4 number A-18-767288-C.

5 183. Plaintiffs are informed and believe, and thereon allege, that defendant Rosemarie
6 Melanson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
7 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
8 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v.*
9 *MGM*, filed January 4, 2018, in the Clark County District Court (“Clark County”), case
10 number A-18-767288-C.

11 184. Plaintiffs are informed and believe, and thereon allege, that defendant Stephanie
12 Melanson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
13 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
14 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v.*
15 *MGM*, filed January 4, 2018, in the Clark County District Court (“Clark County”), case
16 number A-18-767288-C.

17 185. Plaintiffs are informed and believe, and thereon allege, that defendant Stephen
18 Melanson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
19 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
20 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v.*
21 *MGM*, filed January 4, 2018, in the Clark County District Court (“Clark County”), case
22 number A-18-767288-C.

23 186. Plaintiffs are informed and believe, and thereon allege that on October 1, 2017,
24 decedent Austin Meyer, was a resident of the State of Nevada. Plaintiffs are informed and believe
25 and thereon allege that Defendant, the Estate of Austin Meyer, has, through counsel, made claims
26 against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada, or,
27 alternatively, has indicated an intent to make such claims in the future (such as by way of the
28

1 filing of a separate lawsuit – now dismissed, by way of a letter of representation of counsel, or by
2 way of an evidence preservation letter from counsel).

3 187. Plaintiffs are informed and believe, and thereon allege, that defendant Romeo
4 Meyer is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
5 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
6 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
7 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

8 188. Plaintiffs are informed and believe, and thereon allege, that defendant Robert
9 Miller is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
10 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
11 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
12 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

13 189. Plaintiffs are informed and believe, and thereon allege, that defendant Phyllyssa
14 Montoya is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
15 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
16 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
17 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

18 190. Plaintiffs are informed and believe, and thereon allege, that defendant Alyssa
19 Moore is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23 191. Plaintiffs are informed and believe and thereon allege that Defendant Katrina
24 Morgan is a resident of the State of Nevada. Defendant has, through counsel, asserted or
25 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
26 Las Vegas, Nevada.

27 192. Plaintiffs are informed and believe, and thereon allege, that defendant Shancela
28 Myers is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was

1 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
2 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
3 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

4 193. Plaintiffs are informed and believe, and thereon allege, that defendant Marirose
5 Naing is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
6 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
7 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
8 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

9 194. Plaintiffs are informed and believe, and thereon allege, that defendant Anthony
10 Don E. Noarbe is a resident of the State of Nevada. Defendant has previously filed a lawsuit
11 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting
12 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in
13 *Abraham, et al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”),
14 case number BC684047.

15 195. Plaintiffs are informed and believe, and thereon allege, that defendant Amber
16 Norcia is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
17 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
18 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
19 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

20 196. Plaintiffs are informed and believe and thereon allege that Defendant Elsa Nunez is
21 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
22 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

23 197. Plaintiffs are informed and believe, and thereon allege, that defendant Rose
24 O’Toole is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
25 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
26 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
27 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

1 198. Plaintiffs are informed and believe, and thereon allege, that defendant Kuulei Otis
2 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6 199. Plaintiffs are informed and believe and thereon allege that Defendant Stacie Owens
7 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
8 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
9 Nevada.

10 200. Plaintiffs are informed and believe and thereon allege that Defendant Chad Packard
11 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
12 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
13 Nevada.

14 201. Plaintiffs are informed and believe, and thereon allege, that defendant Kaycee Paul
15 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
16 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
17 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
18 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

19 202. Plaintiffs are informed and believe, and thereon allege, that defendant Elisa Perez is
20 a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
21 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
22 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
23 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

24 203. Plaintiffs are informed and believe, and thereon allege, that defendant Angela
25 Marie Perry is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
26 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
27 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
28

1 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case
2 number BC684047.

3 204. Plaintiffs are informed and believe, and thereon allege, that defendant Jeremy
4 Pickett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
5 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
6 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
7 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

8 205. Plaintiffs are informed and believe, and thereon allege, that defendant Jose Plaza is
9 a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
10 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
11 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
12 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

13 206. Plaintiffs are informed and believe, and thereon allege, that defendant Mackenzie
14 Pluta is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
15 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
16 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
17 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

18 207. Plaintiffs are informed and believe, and thereon allege, that defendant Darrian
19 Porter is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23 208. Plaintiffs are informed and believe and thereon allege that Defendant Laura A.
24 Puglia is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
25 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
26 Nevada.

27 209. Plaintiffs are informed and believe, and thereon allege, that defendant Karmjit Raju
28 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was

1 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
2 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
3 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

4 210. Plaintiffs are informed and believe and thereon allege that Defendant Jasmine Rein
5 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
6 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
7 Nevada.

8 211. Plaintiffs are informed and believe, and thereon allege, that defendant Stanley
9 Rendon is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
10 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
11 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Spencer, et al. v. Paddock*,
12 filed October 17, 2017, in Los Angeles Superior Court (“LASC”), case number BC680065.

13 212. Plaintiffs are informed and believe and thereon allege that Defendant Lea
14 Richmond is a resident of the State of Nevada. Defendant has, through counsel, asserted or
15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
16 Las Vegas, Nevada.

17 213. Plaintiffs are informed and believe, and thereon allege, that defendant Israel Rivera
18 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
19 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
20 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
21 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

22 214. Plaintiffs are informed and believe and thereon allege that Defendant Tonia
23 Rocheleau is a resident of the State of Nevada. Defendant has, through counsel, asserted or
24 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
25 Las Vegas, Nevada.

26 215. Plaintiffs are informed and believe and thereon allege that Defendant Michael
27 Rolland is a resident of the State of Nevada. Defendant has, through counsel, asserted or
28

1 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
2 Las Vegas, Nevada.

3 216. Plaintiffs are informed and believe and thereon allege that Defendant Mark Russell
4 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
5 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
6 Nevada.

7 217. Plaintiffs are informed and believe, and thereon allege, that defendant Vincent
8 Sager is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
9 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
10 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
11 filed December 15, 2017, in the Los Angeles Superior Court ("LASC"), case number BC687120.

12 218. Plaintiffs are informed and believe and thereon allege that Defendant Christopher
13 Salinas is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
14 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
15 Nevada.

16 219. Plaintiffs are informed and believe, and thereon allege, that defendant Lenea
17 Sampson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
18 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
19 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Sampson v. MGM*, filed
20 November 15, 2017, in the Clark County District Court ("Clark County"), case
21 number A-17-764733-C.

22 220. Plaintiffs are informed and believe and thereon allege that Defendant Alyssa Sands
23 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
24 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
25 Nevada.

26 221. Plaintiffs are informed and believe, and thereon allege, that defendant Joseph Sartin
27 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
28 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising

1 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
2 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

3 222. Plaintiffs are informed and believe, and thereon allege, that defendant Sarah
4 Scarlett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
5 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
6 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
7 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

8 223. Plaintiffs are informed and believe, and thereon allege, that defendant Shawn
9 Scarlett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
10 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
11 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
12 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

13 224. Plaintiffs are informed and believe, and thereon allege, that defendant Shaylenne
14 Scarlett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
15 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
16 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
17 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

18 225. Plaintiffs are informed and believe and thereon allege that Defendant Kim Schmitz
19 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
20 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
21 Nevada.

22 226. Plaintiffs are informed and believe and thereon allege that Defendant Alison
23 Sheehe is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
24 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
25 Nevada.

26 227. Plaintiffs are informed and believe, and thereon allege, that defendant Christopher
27 Shuemaker is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
28 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims

1 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
2 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
3 BC684047.

4 228. Plaintiffs are informed and believe, and thereon allege, that defendant Breanna
5 Skagen is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
6 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
7 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
8 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

9 229. Plaintiffs are informed and believe and thereon allege that Defendant Jennifer Skoff
10 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
11 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
12 Nevada.

13 230. Plaintiffs are informed and believe, and thereon allege, that defendant Cheyenne
14 Sloan is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
15 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
16 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,
17 filed January 4, 2018, in the Clark County District Court (“Clark County”), case
18 number A-18-767288-C.

19 231. Plaintiffs are informed and believe and thereon allege that Defendant Eden Smith is
20 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
21 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

22 232. Plaintiffs are informed and believe, and thereon allege, that defendant Jasper Smith
23 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
24 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
25 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
26 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

27 233. Plaintiffs are informed and believe, and thereon allege, that defendant Yvonne
28 Smith is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was

1 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
2 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
3 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

4 234. Plaintiffs are informed and believe and thereon allege that Defendant Martin
5 Solano is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
6 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
7 Nevada.

8 235. Plaintiffs are informed and believe, and thereon allege, that defendant Shelby
9 Stalker is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
10 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
11 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,
12 filed January 4, 2018, in the Clark County District Court (“Clark County”), case
13 number A-18-767288-C.

14 236. Plaintiffs are informed and believe and thereon allege that Defendant Chris Stewart
15 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
16 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
17 Nevada.

18 237. Plaintiffs are informed and believe, and thereon allege, that defendant Gregory
19 Tavernite is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23 238. Plaintiffs are informed and believe and thereon allege that Defendant Sam Taylor is
24 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
25 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

26 239. Plaintiffs are informed and believe, and thereon allege, that defendant Wendy
27 Taylor-Hill is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
28 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims

1 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
2 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
3 BC684047.

4 240. Plaintiffs are informed and believe, and thereon allege, that defendant Reginald
5 Tharps is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
6 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
7 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
8 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

9 241. Plaintiffs are informed and believe and thereon allege that Defendant Christina
10 Thebeau is a resident of the State of Nevada. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 242. Plaintiffs are informed and believe, and thereon allege, that defendant David W.
14 Theriault is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
15 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
16 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
17 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

18 243. Plaintiffs are informed and believe, and thereon allege, that defendant Breyana
19 Thomas is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23 244. Plaintiffs are informed and believe, and thereon allege, that defendant Gabrielle
24 Thomas is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
25 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
26 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
27 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

1 245. Plaintiffs are informed and believe, and thereon allege, that defendant Savannah
2 Thomas is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
5 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

6 246. Plaintiffs are informed and believe, and thereon allege, that defendant Steven
7 Thome is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
8 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
9 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
10 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

11 247. Plaintiffs are informed and believe, and thereon allege, that defendant Alva Bruce
12 Tilley is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16 248. Plaintiffs are informed and believe and thereon allege that Defendant Mariya Toro
17 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
18 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
19 Nevada.

20 249. Plaintiffs are informed and believe, and thereon allege, that defendant Kathryn
21 Tressler is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
22 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
23 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Tressler v. MGM*, filed
24 November 15, 2017, in the Clark County District Court (“Clark County”), case
25 number A-17-764722-C.

26 250. Plaintiffs are informed and believe, and thereon allege, that defendant Jennifer A.
27 Turner is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
28 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising

1 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
2 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

3 251. Plaintiffs are informed and believe and thereon allege that Defendant Deborah
4 Urrizaga is a resident of the State of Nevada. Defendant has, through counsel, asserted or
5 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
6 Las Vegas, Nevada.

7 252. Plaintiffs are informed and believe, and thereon allege, that defendant William F.
8 Vanderveer is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
9 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
10 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
11 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
12 BC684047.

13 253. Plaintiffs are informed and believe, and thereon allege, that defendant Frank
14 Vealencis is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
15 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
16 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
17 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
18 BC684047.

19 254. Plaintiffs are informed and believe, and thereon allege, that defendant Tamara
20 Vealencis is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
21 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
22 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
23 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
24 BC684047.

25 255. Plaintiffs are informed and believe and thereon allege that Defendant Regina Viola
26 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
27 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
28 Nevada.

1 256. Plaintiffs are informed and believe, and thereon allege, that defendant Alyssa
2 Walker is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
5 filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

6 257. Plaintiffs are informed and believe, and thereon allege, that defendant Tikiesha
7 Wasp is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
8 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
9 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
10 filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

11 258. Plaintiffs are informed and believe, and thereon allege, that defendant Donald
12 Welty is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
15 filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

16 259. Plaintiffs are informed and believe, and thereon allege, that defendant Zachary
17 Wilcox is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
18 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
19 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
20 filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

21 260. Plaintiffs are informed and believe, and thereon allege, that defendant Jordan
22 Wilkinson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
23 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
24 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
25 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number
26 BC684047.

27 261. Plaintiffs are informed and believe, and thereon allege, that defendant Jeffery
28 Williams is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was

1 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
2 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
3 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

4 262. Plaintiffs are informed and believe, and thereon allege, that defendant Teracio
5 Williams is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
6 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
7 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
8 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

9 263. Plaintiffs are informed and believe, and thereon allege, that defendant Gary “Opie”
10 Allen Wise is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
11 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
12 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
13 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
14 BC684047.

15 264. Plaintiffs are informed and believe, and thereon allege, that defendant John Yonts
16 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
17 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
18 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
19 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

20 265. Plaintiffs are informed and believe and thereon allege that Defendant Jamie Zaleski
21 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
22 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
23 Nevada.

24 266. Plaintiffs are informed and believe and thereon allege that Defendant Janet
25 Zmyewski is a resident of the State of Nevada. Defendant has, through counsel, asserted or
26 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
27 Las Vegas, Nevada.

1 267. Plaintiffs are informed and believe and thereon allege that Defendant Thomas
2 Zmyewski is a resident of the State of Nevada. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 268. Plaintiffs are informed and believe and thereon allege that Defendant Essence
6 Abner is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 269. Plaintiffs are informed and believe and thereon allege that Defendant Allen Afshari
10 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 270. Plaintiffs are informed and believe and thereon allege that Defendant Rae N.
14 Aguayo is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 271. Plaintiffs are informed and believe and thereon allege that Defendant Khaled
18 Ahmed is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 272. Plaintiffs are informed and believe and thereon allege that Defendant Nikki Renee
22 Ann Alirez is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 273. Plaintiffs are informed and believe and thereon allege that Defendant Nadia Allie is
26 a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
27 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
28 Las Vegas, Nevada.

1 274. Plaintiffs are informed and believe and thereon allege that Defendant Frank
2 Michael Anderson III is a citizen of the State of Nevada, County of Clark. Defendant has, through
3 counsel, asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017,
4 shooting incident in Las Vegas, Nevada.

5 275. Plaintiffs are informed and believe and thereon allege that Defendant Trina
6 Andrade-Kwist is a citizen of the State of Nevada, County of Clark. Defendant has, through
7 counsel, asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017,
8 shooting incident in Las Vegas, Nevada.

9 276. Plaintiffs are informed and believe and thereon allege that Defendant Cassidy
10 Andreason is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 277. Plaintiffs are informed and believe and thereon allege that Defendant Jennifer
14 Arellanes is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 278. Plaintiffs are informed and believe and thereon allege that Defendant Samanta
18 Arjune is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 279. Plaintiffs are informed and believe and thereon allege that Defendant Andrew
22 Ayala is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 280. Plaintiffs are informed and believe and thereon allege that Defendant Joseph I.
26 Balas is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
27 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
28 Nevada.

1 281. Plaintiffs are informed and believe and thereon allege that Defendant Tanya
2 Banuelos is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 282. Plaintiffs are informed and believe and thereon allege that Defendant Audrey
6 Bareham is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
7 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
8 Las Vegas, Nevada.

9 283. Plaintiffs are informed and believe and thereon allege that Defendant Kyle Basom
10 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 284. Plaintiffs are informed and believe and thereon allege that Defendant Robert Alton
14 Beaird is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 285. Plaintiffs are informed and believe and thereon allege that Defendant Antonyo Bell
18 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 286. Plaintiffs are informed and believe and thereon allege that Defendant Wendy Marie
22 Benford is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 287. Plaintiffs are informed and believe and thereon allege that Defendant Cardell
26 Benson Jr. is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 288. Plaintiffs are informed and believe and thereon allege that Defendant Damaen
2 Bentley is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
3 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 289. Plaintiffs are informed and believe and thereon allege that Defendant Malcolm
6 Bissember is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
7 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
8 Las Vegas, Nevada.

9 290. Plaintiffs are informed and believe and thereon allege that Defendant Ed Boucher is
10 a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
11 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

12 291. Plaintiffs are informed and believe and thereon allege that Defendant Jenna Boyer
13 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
14 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
15 Las Vegas, Nevada.

16 292. Plaintiffs are informed and believe and thereon allege that Defendant Fillise Boykin
17 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
18 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
19 Las Vegas, Nevada.

20 293. Plaintiffs are informed and believe and thereon allege that Defendant Tia Boykin is
21 a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
22 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
23 Las Vegas, Nevada.

24 294. Plaintiffs are informed and believe and thereon allege that Defendant Carrie
25 Allmen Bradshaw is a citizen of the State of Nevada, County of Clark. Defendant has, through
26 counsel, asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017,
27 shooting incident in Las Vegas, Nevada.

1 295. Plaintiffs are informed and believe and thereon allege that Defendant Jocelyn
2 Brady is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 296. Plaintiffs are informed and believe and thereon allege that Defendant Nickee
6 Branham-Skoff is a citizen of the State of Nevada, County of Clark. Defendant has, through
7 counsel, asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017,
8 shooting incident in Las Vegas, Nevada.

9 297. Plaintiffs are informed and believe and thereon allege that Defendant Robert J.
10 Brickman II is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 298. Plaintiffs are informed and believe and thereon allege that Defendant Bill Bringold
14 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
16 Las Vegas, Nevada.

17 299. Plaintiffs are informed and believe and thereon allege that Defendant Nicholas
18 Bronas is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 300. Plaintiffs are informed and believe and thereon allege that Defendant Gregory
22 Brown is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 301. Plaintiffs are informed and believe and thereon allege that Defendant Brett
26 Bruckner is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 302. Plaintiffs are informed and believe and thereon allege that Defendant Celia
2 Brunghurst is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 303. Plaintiffs are informed and believe and thereon allege that Defendant Elijah
6 Brunghurst is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 304. Plaintiffs are informed and believe and thereon allege that Defendant Jayceon
10 Brunghurst is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 305. Plaintiffs are informed and believe and thereon allege that Defendant Regina Bui is
14 a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
15 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

16 306. Plaintiffs are informed and believe and thereon allege that Defendant David Lynn
17 Bunch is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
18 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
19 incident in Las Vegas, Nevada.

20 307. Plaintiffs are informed and believe and thereon allege that Defendant Walter Burch
21 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
22 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
23 Las Vegas, Nevada.

24 308. Plaintiffs are informed and believe and thereon allege that Defendant Kayla Burdo
25 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
26 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
27 Las Vegas, Nevada.

1 309. Plaintiffs are informed and believe and thereon allege that Defendant Gero
2 Burgard is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 310. Plaintiffs are informed and believe and thereon allege that Defendant Zachary
6 Burkes is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 311. Plaintiffs are informed and believe and thereon allege that Defendant Shanna
10 Burrell is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 312. Plaintiffs are informed and believe and thereon allege that Defendant Samuel
14 Cabasag is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 313. Plaintiffs are informed and believe and thereon allege that Defendant Russell
18 Cahoy is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 314. Plaintiffs are informed and believe and thereon allege that Defendant Nicholas
22 Joseph Cain-Casey is a citizen of the State of Nevada, County of Clark. Defendant has, through
23 counsel, asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017,
24 shooting incident in Las Vegas, Nevada.

25 315. Plaintiffs are informed and believe and thereon allege that Defendant Jamie
26 Calvillo is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 316. Plaintiffs are informed and believe and thereon allege that Defendant Ben Carey is
2 a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 317. Plaintiffs are informed and believe and thereon allege that Defendant Christine
6 Caria is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
7 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
8 Nevada.

9 318. Plaintiffs are informed and believe and thereon allege that Defendant Janice
10 Carone-Howard is a citizen of the State of Nevada, County of Clark. Defendant has, through
11 counsel, asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017,
12 shooting incident in Las Vegas, Nevada.

13 319. Plaintiffs are informed and believe and thereon allege that Defendant Deonna
14 Carter is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
15 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
16 Nevada.

17 320. Plaintiffs are informed and believe and thereon allege that Defendant Anthony
18 Cavallaro is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 321. Plaintiffs are informed and believe and thereon allege that Defendant Walter M.
22 Centeno is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 322. Plaintiffs are informed and believe and thereon allege that Defendant Angelica
26 Cervantes is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 323. Plaintiffs are informed and believe and thereon allege that Defendant Anjenette
2 Cheney is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 324. Plaintiffs are informed and believe and thereon allege that Defendant Penny
6 Chenier is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 325. Plaintiffs are informed and believe and thereon allege that Defendant Diane
10 Christian is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 326. Plaintiffs are informed and believe and thereon allege that Defendant Austin
14 Christiansen is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
16 Las Vegas, Nevada.

17 327. Plaintiffs are informed and believe and thereon allege that Defendant Ashley
18 Bernard Christmas is a citizen of the State of Nevada, County of Clark. Defendant has, through
19 counsel, asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017,
20 shooting incident in Las Vegas, Nevada.

21 328. Plaintiffs are informed and believe and thereon allege that Defendant Manuel
22 Cigarroa is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 329. Plaintiffs are informed and believe and thereon allege that Defendant Grace Claros
26 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
27 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
28 Las Vegas, Nevada.

1 330. Plaintiffs are informed and believe and thereon allege that Defendant Jermaine
2 Colquitt is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 331. Plaintiffs are informed and believe and thereon allege that Defendant Glen
6 Coonfield is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
7 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
8 Las Vegas, Nevada.

9 332. Plaintiffs are informed and believe and thereon allege that Defendant Diana Corradi
10 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 333. Plaintiffs are informed and believe and thereon allege that Defendant Teri Craney is
14 a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
16 Las Vegas, Nevada.

17 334. Plaintiffs are informed and believe and thereon allege that Defendant Stephen
18 Crawford is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 335. Plaintiffs are informed and believe and thereon allege that Defendant Justin Cregar
22 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
23 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
24 Las Vegas, Nevada.

25 336. Plaintiffs are informed and believe and thereon allege that Defendant Anthony
26 Crespín is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 337. Plaintiffs are informed and believe and thereon allege that Defendant Evelyn Crisp
2 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 338. Plaintiffs are informed and believe and thereon allege that Defendant Jasper Cross
6 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
7 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
8 Las Vegas, Nevada.

9 339. Plaintiffs are informed and believe and thereon allege that Defendant John W.
10 Crowe Jr. is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 340. Plaintiffs are informed and believe and thereon allege that Defendant Calli Dee
14 Curry is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 341. Plaintiffs are informed and believe and thereon allege that Defendant Rutia Curry is
18 a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 342. Plaintiffs are informed and believe and thereon allege that Defendant Kinga
22 Dajbukat is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 343. Plaintiffs are informed and believe and thereon allege that Defendant Latief Daniels
26 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
27 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
28 Las Vegas, Nevada.

1 344. Plaintiffs are informed and believe and thereon allege that Defendant Juanitta
2 Darlynn is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 345. Plaintiffs are informed and believe and thereon allege that Defendant Walter D.
6 Davenport is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 346. Plaintiffs are informed and believe and thereon allege that Defendant Carletta
10 Davis is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 347. Plaintiffs are informed and believe and thereon allege that Defendant Diane Davis
14 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
16 Las Vegas, Nevada.

17 348. Plaintiffs are informed and believe and thereon allege that Defendant Nicole Davis
18 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 349. Plaintiffs are informed and believe and thereon allege that Defendant Quintin Davis
22 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
23 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
24 Las Vegas, Nevada.

25 350. Plaintiffs are informed and believe and thereon allege that Defendant William
26 Zenon De Armas is a citizen of the State of Nevada, County of Clark. Defendant has, through
27 counsel, asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017,
28 shooting incident in Las Vegas, Nevada.

1 351. Plaintiffs are informed and believe and thereon allege that Defendant Krystalyn
2 Desoto is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 352. Plaintiffs are informed and believe and thereon allege that Defendant Alfred
6 Devault is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 353. Plaintiffs are informed and believe and thereon allege that Defendant Cleveland
10 Dickerson is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 354. Plaintiffs are informed and believe and thereon allege that Defendant Juanita
14 Dillard is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 355. Plaintiffs are informed and believe and thereon allege that Defendant Katrina
18 Dimacali is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 356. Plaintiffs are informed and believe and thereon allege that Defendant David Dogan
22 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
23 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
24 Las Vegas, Nevada.

25 357. Plaintiffs are informed and believe and thereon allege that Defendant Lisa Ann
26 Lelanie Domen is a citizen of the State of Nevada, County of Clark. Defendant has, through
27 counsel, asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017,
28 shooting incident in Las Vegas, Nevada.

1 358. Plaintiffs are informed and believe and thereon allege that Defendant Heather E.
2 Donat is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 359. Plaintiffs are informed and believe and thereon allege that Defendant Liliana Donis
6 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
7 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
8 Las Vegas, Nevada.

9 360. Plaintiffs are informed and believe and thereon allege that Defendant Jaquashia
10 Douglas is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 361. Plaintiffs are informed and believe and thereon allege that Defendant Laureen
14 Dright is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
15 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
16 Nevada.

17 362. Plaintiffs are informed and believe and thereon allege that Defendant Cynthia
18 Michelle Duarte is a citizen of the State of Nevada, County of Clark. Defendant has, through
19 counsel, asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017,
20 shooting incident in Las Vegas, Nevada.

21 363. Plaintiffs are informed and believe and thereon allege that Defendant Cynthia
22 Eaglin is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 364. Plaintiffs are informed and believe and thereon allege that Defendant Arthur T. Earl
26 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
27 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
28 Las Vegas, Nevada.

1 365. Plaintiffs are informed and believe and thereon allege that Defendant Chris
2 Eastman is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 366. Plaintiffs are informed and believe and thereon allege that Defendant Jennifer
6 Eckmann is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 367. Plaintiffs are informed and believe and thereon allege that Defendant Tijuana
10 Edwards is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 368. Plaintiffs are informed and believe and thereon allege that Defendant Damian K.
14 Einbinder is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 369. Plaintiffs are informed and believe and thereon allege that Defendant Salofiitu
18 Emanuele is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 370. Plaintiffs are informed and believe, and thereon allege, that defendant Heidi
22 Farnam is a citizen of the State of Nevada. Defendant has previously filed a lawsuit (which was
23 subsequently dismissed) against one or more of the Plaintiffs, asserting claims arising from the
24 October 1, 2017, shooting incident in Las Vegas, Nevada. Based on the allegations in that lawsuit
25 *Abraham, et al. v. MGM Resorts Int'l, et al.*, filed November 20, 2017, in the Los Angeles
26 Superior Court ("LASC"), case number BC684047, Plaintiffs are informed and believe that
27 Defendant is a citizen of the State of Nevada.
28

1 371. Plaintiffs are informed and believe and thereon allege that Defendant Laughton Fell
2 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 372. Plaintiffs are informed and believe and thereon allege that Defendant Joshua
6 Fenoglia is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 373. Plaintiffs are informed and believe and thereon allege that Defendant Clarence
10 Fisher is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 374. Plaintiffs are informed and believe and thereon allege that Defendant Laura Fiston
14 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
16 Las Vegas, Nevada.

17 375. Plaintiffs are informed and believe and thereon allege that Defendant Precious
18 Flowers is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 376. Plaintiffs are informed and believe and thereon allege that Defendant Evarick Ford
22 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
23 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
24 Las Vegas, Nevada.

25 377. Plaintiffs are informed and believe and thereon allege that Defendant Jason A. Ford
26 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
27 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
28 Las Vegas, Nevada.

1 378. Plaintiffs are informed and believe and thereon allege that Defendant Mindy P.
2 Foster is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 379. Plaintiffs are informed and believe and thereon allege that Defendant William
6 Fountain is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 380. Plaintiffs are informed and believe and thereon allege that Defendant Gerald
10 Fowler is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 381. Plaintiffs are informed and believe and thereon allege that Defendant Matthew Fox
14 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
15 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
16 Nevada.

17 382. Plaintiffs are informed and believe and thereon allege that Defendant Aileen R.
18 Franklyn is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 383. Plaintiffs are informed and believe and thereon allege that Defendant Eric Fraser is
22 a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
23 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
24 Las Vegas, Nevada.

25 384. Plaintiffs are informed and believe and thereon allege that Defendant Lashea
26 Frazier is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 385. Plaintiffs are informed and believe and thereon allege that Defendant Nicole Lynn
2 French is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
3 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 386. Plaintiffs are informed and believe and thereon allege that Defendant Jeremy Frie is
6 a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
7 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
8 Las Vegas, Nevada.

9 387. Plaintiffs are informed and believe and thereon allege that Defendant Lisa Furman
10 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 388. Plaintiffs are informed and believe and thereon allege that Defendant Michael
14 Galasso is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 389. Plaintiffs are informed and believe and thereon allege that Defendant Bridgett
18 Galloway is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 390. Plaintiffs are informed and believe and thereon allege that Defendant Mia Gantt is a
22 citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
23 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
24 Las Vegas, Nevada.

25 391. Plaintiffs are informed and believe and thereon allege that Defendant Frankie
26 Garcia is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 392. Plaintiffs are informed and believe and thereon allege that Defendant Lisandra
2 Garcia is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 393. Plaintiffs are informed and believe and thereon allege that Defendant Jose A.
6 Garduno is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 394. Plaintiffs are informed and believe and thereon allege that Defendant Oliver
10 Garnica is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 395. Plaintiffs are informed and believe and thereon allege that Defendant Paul George
14 Jr. is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
15 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
16 Nevada.

17 396. Plaintiffs are informed and believe and thereon allege that Defendant Charmaine
18 Germany is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 397. Plaintiffs are informed and believe and thereon allege that Defendant Thomas
22 Geschrey is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 398. Plaintiffs are informed and believe and thereon allege that Defendant Selam
26 Ghirmay is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 399. Plaintiffs are informed and believe and thereon allege that Defendant Erika
2 Giesecke is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 400. Plaintiffs are informed and believe and thereon allege that Defendant Stephen Giles
6 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
7 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
8 Las Vegas, Nevada.

9 401. Plaintiffs are informed and believe and thereon allege that Defendant Atalie
10 Gillison is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
11 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
12 Nevada.

13 402. Plaintiffs are informed and believe and thereon allege that Defendant Barbara J.
14 Godron is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
15 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
16 Nevada.

17 403. Plaintiffs are informed and believe and thereon allege that Defendant Del Golden is
18 a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
19 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

20 404. Plaintiffs are informed and believe and thereon allege that Defendant Keosha
21 Goldman is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
22 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
23 Las Vegas, Nevada.

24 405. Plaintiffs are informed and believe and thereon allege that Defendant Avery
25 Goldston is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
26 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
27 incident in Las Vegas, Nevada.

1 406. Plaintiffs are informed and believe and thereon allege that Defendant Natalie
2 Bridges Goodrum is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 407. Plaintiffs are informed and believe and thereon allege that Defendant Tracy L.
6 Gorman is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 408. Plaintiffs are informed and believe and thereon allege that Defendant Cheryl Grady
10 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
11 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
12 Nevada.

13 409. Plaintiffs are informed and believe and thereon allege that Defendant Melvin Grant
14 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
16 Las Vegas, Nevada.

17 410. Plaintiffs are informed and believe and thereon allege that Defendant Katrina
18 Graves is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 411. Plaintiffs are informed and believe and thereon allege that Defendant Tawny Gray
22 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
23 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
24 Las Vegas, Nevada.

25 412. Plaintiffs are informed and believe and thereon allege that Defendant Mario
26 Grayson is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
27 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
28 Las Vegas, Nevada.

1 413. Plaintiffs are informed and believe and thereon allege that Defendant Deanna
2 Griese is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
3 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 414. Plaintiffs are informed and believe and thereon allege that Defendant Kimberly
6 Griffis is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 415. Plaintiffs are informed and believe and thereon allege that Defendant Rudy Guarino
10 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 416. Plaintiffs are informed and believe and thereon allege that Defendant Joel D.
14 Guzman is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 417. Plaintiffs are informed and believe and thereon allege that Defendant Leo Hairston
18 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
19 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
20 Nevada.

21 418. Plaintiffs are informed and believe and thereon allege that Defendant Martinez Hall
22 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
23 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
24 Las Vegas, Nevada.

25 419. Plaintiffs are informed and believe and thereon allege that Defendant Cody Wayne
26 Hansen is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 420. Plaintiffs are informed and believe and thereon allege that Defendant Samantha
2 Harb is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 421. Plaintiffs are informed and believe and thereon allege that Defendant Alicia
6 Harmon is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 422. Plaintiffs are informed and believe and thereon allege that Defendant Derrick
10 Harris is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
11 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
12 Nevada.

13 423. Plaintiffs are informed and believe and thereon allege that Defendant Latiesha
14 Harris is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
15 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
16 Nevada.

17 424. Plaintiffs are informed and believe and thereon allege that Defendant Mandi Harris
18 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 425. Plaintiffs are informed and believe and thereon allege that Defendant Stacey Harris
22 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
23 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
24 Las Vegas, Nevada.

25 426. Plaintiffs are informed and believe and thereon allege that Defendant Amir Hasan
26 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
27 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
28 Las Vegas, Nevada.

1 427. Plaintiffs are informed and believe and thereon allege that Defendant Tara Hastings
2 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 428. Plaintiffs are informed and believe and thereon allege that Defendant Martin
6 Hathcock is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 429. Plaintiffs are informed and believe and thereon allege that Defendant Edward R.
10 Hazen is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 430. Plaintiffs are informed and believe and thereon allege that Defendant Sean Healy is
14 a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
16 Las Vegas, Nevada.

17 431. Plaintiffs are informed and believe and thereon allege that Defendant John Hefley
18 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 432. Plaintiffs are informed and believe and thereon allege that Defendant Adalgisa
22 Henning is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 433. Plaintiffs are informed and believe and thereon allege that Defendant Sumer
26 Henning is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 434. Plaintiffs are informed and believe and thereon allege that Defendant Damian
2 Henry is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 435. Plaintiffs are informed and believe and thereon allege that Defendant Sheela L.
6 Henry is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
7 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
8 Nevada.

9 436. Plaintiffs are informed and believe and thereon allege that Defendant Carly
10 Henschel is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 437. Plaintiffs are informed and believe and thereon allege that Defendant Shauntel
14 Hibbitt is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
15 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
16 Nevada.

17 438. Plaintiffs are informed and believe and thereon allege that Defendant Jordan Hicks
18 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 439. Plaintiffs are informed and believe and thereon allege that Defendant Shannon
22 Hicks is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 440. Plaintiffs are informed and believe and thereon allege that Defendant Susan Himes
26 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
27 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
28 Las Vegas, Nevada.

1 441. Plaintiffs are informed and believe and thereon allege that Defendant Eboney
2 Nicole Hines is a citizen of the State of Nevada, County of Clark. Defendant has, through
3 counsel, asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017,
4 shooting incident in Las Vegas, Nevada.

5 442. Plaintiffs are informed and believe and thereon allege that Defendant Nathan
6 Hinrichs is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 443. Plaintiffs are informed and believe and thereon allege that Defendant Abigail
10 Hinton is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
11 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
12 Nevada.

13 444. Plaintiffs are informed and believe and thereon allege that Defendant Adriana
14 Hinton is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
15 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
16 Nevada.

17 445. Plaintiffs are informed and believe and thereon allege that Defendant Alexis Hinton
18 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 446. Plaintiffs are informed and believe and thereon allege that Defendant Ambear
22 Hinton is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
23 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
24 Nevada.

25 447. Plaintiffs are informed and believe and thereon allege that Defendant Rick Hinton
26 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
27 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
28 Nevada.

1 448. Plaintiffs are informed and believe and thereon allege that Defendant Jennifer
2 Hohnke is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
3 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 449. Plaintiffs are informed and believe and thereon allege that Defendant Don
6 Holbrook is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
7 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
8 Las Vegas, Nevada.

9 450. Plaintiffs are informed and believe and thereon allege that Defendant June Holdren
10 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 451. Plaintiffs are informed and believe and thereon allege that Defendant Amber Holm
14 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
16 Las Vegas, Nevada.

17 452. Plaintiffs are informed and believe and thereon allege that Defendant Raven
18 Holmes is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 453. Plaintiffs are informed and believe and thereon allege that Defendant Shaunte
22 Horton is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 454. Plaintiffs are informed and believe and thereon allege that Defendant Abdirahman
26 Hosain is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 455. Plaintiffs are informed and believe and thereon allege that Defendant Misty House
2 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 456. Plaintiffs are informed and believe and thereon allege that Defendant Delose
6 Howard is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 457. Plaintiffs are informed and believe and thereon allege that Defendant Svetlana
10 Huey is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
11 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
12 Nevada.

13 458. Plaintiffs are informed and believe and thereon allege that Defendant Britin C.
14 Hughes is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
15 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
16 Nevada.

17 459. Plaintiffs are informed and believe and thereon allege that Defendant Steve
18 Hutchason is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 460. Plaintiffs are informed and believe and thereon allege that Defendant Anthony
22 Isabel is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 461. Plaintiffs are informed and believe and thereon allege that Defendant Devonta
26 Jackson is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 462. Plaintiffs are informed and believe and thereon allege that Defendant John Jenkins
2 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 463. Plaintiffs are informed and believe and thereon allege that Defendant Daviell
6 Johnson is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 464. Plaintiffs are informed and believe and thereon allege that Defendant Larontae
10 Johnson is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 465. Plaintiffs are informed and believe and thereon allege that Defendant Malvin
14 Johnson is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 466. Plaintiffs are informed and believe and thereon allege that Defendant Renae Jolley
18 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 467. Plaintiffs are informed and believe and thereon allege that Defendant Joniqueka
22 Jones is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 468. Plaintiffs are informed and believe and thereon allege that Defendant Lannetta
26 Jones is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
27 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
28 Nevada.

1 469. Plaintiffs are informed and believe and thereon allege that Defendant Briana Joseph
2 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 470. Plaintiffs are informed and believe and thereon allege that Defendant Juan Juarez is
6 a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
7 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
8 Las Vegas, Nevada.

9 471. Plaintiffs are informed and believe and thereon allege that Defendant John Julias is
10 a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
11 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

12 472. Plaintiffs are informed and believe and thereon allege that Defendant Brandon
13 Kalaaukahi is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
14 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
15 incident in Las Vegas, Nevada.

16 473. Plaintiffs are informed and believe and thereon allege that Defendant Ron Katz is a
17 citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
18 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
19 Las Vegas, Nevada.

20 474. Plaintiffs are informed and believe and thereon allege that Defendant Waltkoya
21 Kayzee is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
22 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
23 incident in Las Vegas, Nevada.

24 475. Plaintiffs are informed and believe and thereon allege that Defendant Heather Kerr
25 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
26 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
27 Las Vegas, Nevada.

28

1 476. Plaintiffs are informed and believe and thereon allege that Defendant Joseph
2 Kinder is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
3 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 477. Plaintiffs are informed and believe and thereon allege that Defendant Tara King is a
6 citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
7 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

8 478. Plaintiffs are informed and believe and thereon allege that Defendant Richard
9 Kingery is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
10 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
11 incident in Las Vegas, Nevada.

12 479. Plaintiffs are informed and believe and thereon allege that Defendant Cynthia
13 Kitchens is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
14 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
15 incident in Las Vegas, Nevada.

16 480. Plaintiffs are informed and believe and thereon allege that Defendant Joseph
17 Kocjan is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
18 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
19 incident in Las Vegas, Nevada.

20 481. Plaintiffs are informed and believe and thereon allege that Defendant Ambriz
21 Ladson is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
22 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
23 incident in Las Vegas, Nevada.

24 482. Plaintiffs are informed and believe and thereon allege that Defendant Miguel Lagos
25 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
26 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
27 Las Vegas, Nevada.

1 483. Plaintiffs are informed and believe and thereon allege that Defendant Bradley Kent
2 Lagro is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
3 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 484. Plaintiffs are informed and believe and thereon allege that Defendant Martin L.
6 Landers is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 485. Plaintiffs are informed and believe and thereon allege that Defendant Quentin
10 Lathan is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 486. Plaintiffs are informed and believe and thereon allege that Defendant Michael
14 Leahy is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 487. Plaintiffs are informed and believe and thereon allege that Defendant Chloe Lebo is
18 a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 488. Plaintiffs are informed and believe and thereon allege that Defendant Kathryn
22 Renee Leckie is a citizen of the State of Nevada, County of Clark. Defendant has, through
23 counsel, asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017,
24 shooting incident in Las Vegas, Nevada.

25 489. Plaintiffs are informed and believe and thereon allege that Defendant Maxime
26 Lecocq is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 490. Plaintiffs are informed and believe and thereon allege that Defendant Mhonai Lee
2 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 491. Plaintiffs are informed and believe and thereon allege that Defendant Yvonne Lee
6 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
7 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
8 Las Vegas, Nevada.

9 492. Plaintiffs are informed and believe and thereon allege that Defendant Aitor Lejardi
10 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 493. Plaintiffs are informed and believe and thereon allege that Defendant Crystal
14 Lejardi is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 494. Plaintiffs are informed and believe and thereon allege that Defendant Tara
18 Lemmons is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 495. Plaintiffs are informed and believe and thereon allege that Defendant Alicia
22 Leonard is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
23 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
24 Las Vegas, Nevada.

25 496. Plaintiffs are informed and believe and thereon allege that Defendant Samuel Leuty
26 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
27 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
28 Las Vegas, Nevada.

1 497. Plaintiffs are informed and believe and thereon allege that Defendant Ashley
2 Breanna Lewis is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 498. Plaintiffs are informed and believe and thereon allege that Defendant Carolyn
6 Lizama is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
7 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
8 Nevada.

9 499. Plaintiffs are informed and believe and thereon allege that Defendant Corinne
10 Lomas is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 500. Plaintiffs are informed and believe and thereon allege that Defendant Eileen Lopez
14 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
15 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
16 Nevada.

17 501. Plaintiffs are informed and believe and thereon allege that Defendant Jahaira Losey
18 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
19 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
20 Nevada.

21 502. Plaintiffs are informed and believe and thereon allege that Defendant Zekiel Losey
22 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
23 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
24 Nevada.

25 503. Plaintiffs are informed and believe and thereon allege that Defendant Jeremy
26 Lowery is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 504. Plaintiffs are informed and believe and thereon allege that Defendant Nicole
2 Luciano is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 505. Plaintiffs are informed and believe and thereon allege that Defendant Kayla Macias
6 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
7 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
8 Nevada.

9 506. Plaintiffs are informed and believe and thereon allege that Defendant Cynthia
10 Maevers is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 507. Plaintiffs are informed and believe and thereon allege that Defendant William
14 Maloney is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
16 Las Vegas, Nevada.

17 508. Plaintiffs are informed and believe and thereon allege that Defendant Eric Maltz is
18 a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 509. Plaintiffs are informed and believe and thereon allege that Defendant William
22 Manciano is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 510. Plaintiffs are informed and believe and thereon allege that Defendant Michelle
26 Xani Mangibin is a citizen of the State of Nevada, County of Clark. Defendant has, through
27 counsel, asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017,
28 shooting incident in Las Vegas, Nevada.

1 511. Plaintiffs are informed and believe and thereon allege that Defendant Shirley
2 Manus is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 512. Plaintiffs are informed and believe and thereon allege that Defendant Dashaun
6 Marshall is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 513. Plaintiffs are informed and believe and thereon allege that Defendant Donte
10 Marshall is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 514. Plaintiffs are informed and believe and thereon allege that Defendant Holy Angel
14 Martinez is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 515. Plaintiffs are informed and believe and thereon allege that Defendant Steven
18 Martinez is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 516. Plaintiffs are informed and believe and thereon allege that Defendant Lana Mathis
22 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
23 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
24 Nevada.

25 517. Plaintiffs are informed and believe and thereon allege that Defendant Monique
26 Maxey is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
27 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
28 Nevada.

1 518. Plaintiffs are informed and believe and thereon allege that Defendant Jamie
2 Maxwell is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 519. Plaintiffs are informed and believe and thereon allege that Defendant Moussa
6 Mboup is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 520. Plaintiffs are informed and believe and thereon allege that Defendant Szilvia
10 McBride is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 521. Plaintiffs are informed and believe and thereon allege that Defendant Kemmy
14 McCoy is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
15 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
16 Nevada.

17 522. Plaintiffs are informed and believe and thereon allege that Defendant Jamonte
18 McCullar is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 523. Plaintiffs are informed and believe and thereon allege that Defendant Shirley
22 McCurry is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 524. Plaintiffs are informed and believe and thereon allege that Defendant Tashara
26 McMullen is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 525. Plaintiffs are informed and believe and thereon allege that Defendant Rajai J.
2 McNeill is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 526. Plaintiffs are informed and believe and thereon allege that Defendant Christian
6 McQuown is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 527. Plaintiffs are informed and believe and thereon allege that Defendant Jamie
10 Medeiros is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 528. Plaintiffs are informed and believe and thereon allege that Defendant Jovannie
14 Mediano is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 529. Plaintiffs are informed and believe and thereon allege that Defendant Kidada
18 Medina is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 530. Plaintiffs are informed and believe and thereon allege that Defendant Laurel Meek
22 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
23 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
24 Las Vegas, Nevada.

25 531. Plaintiffs are informed and believe and thereon allege that Defendant Janette Mejia
26 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
27 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
28 Las Vegas, Nevada.

1 532. Plaintiffs are informed and believe and thereon allege that Defendant Joshua Mejia
2 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 533. Plaintiffs are informed and believe and thereon allege that Defendant Ireri Mendez-
6 Alvarez is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 534. Plaintiffs are informed and believe and thereon allege that Defendant Jose
10 Menendez is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 535. Plaintiffs are informed and believe and thereon allege that Defendant Darren
14 Merriweather is a citizen of the State of Nevada, County of Clark. Defendant has, through
15 counsel, asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017,
16 shooting incident in Las Vegas, Nevada.

17 536. Plaintiffs are informed and believe and thereon allege that Defendant Vanessa
18 Michels is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 537. Plaintiffs are informed and believe and thereon allege that Defendant Jarod
22 Mielcarek is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 538. Plaintiffs are informed and believe and thereon allege that Defendant Jaza'na Miller
26 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
27 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
28 Las Vegas, Nevada.

1 539. Plaintiffs are informed and believe and thereon allege that Defendant Jazmia Miller
2 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 540. Plaintiffs are informed and believe and thereon allege that Defendant LeVelle Mills
6 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
7 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
8 Nevada.

9 541. Plaintiffs are informed and believe and thereon allege that Defendant Kimani
10 Mitchell is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 542. Plaintiffs are informed and believe and thereon allege that Defendant Lazaro Mont-
14 Ros is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted
15 or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident
16 in Las Vegas, Nevada.

17 543. Plaintiffs are informed and believe and thereon allege that Defendant Markeith
18 Moore is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 544. Plaintiffs are informed and believe and thereon allege that Defendant Darrin
22 Moreman is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 545. Plaintiffs are informed and believe and thereon allege that Defendant Georgianne
26 Marie Morgan is a citizen of the State of Nevada, County of Clark. Defendant has, through
27 counsel, asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017,
28 shooting incident in Las Vegas, Nevada.

1 546. Plaintiffs are informed and believe and thereon allege that Defendant Shakiera
2 Morris is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 547. Plaintiffs are informed and believe and thereon allege that Defendant
6 Devonte-Amir Morrison is a citizen of the State of Nevada, County of Clark. Defendant has,
7 through counsel, asserted or threatened to assert claims against Plaintiffs based upon the
8 October 1, 2017, shooting incident in Las Vegas, Nevada.

9 548. Plaintiffs are informed and believe, and thereon allege, that defendant LaDarius
10 Morrison is a citizen of the State of Nevada. Defendant has previously filed a lawsuit (which was
11 subsequently dismissed) against one or more of the Plaintiffs, asserting claims arising from the
12 October 1, 2017, shooting incident in Las Vegas, Nevada. Based on the allegations in that lawsuit
13 *Abraham, et al. v. MGM Resorts Int'l, et al.*, filed November 20, 2017, in the Los Angeles
14 Superior Court ("LASC"), case number BC684047, Plaintiffs are informed and believe that
15 Defendant is a citizen of the State of Nevada.

16 549. Plaintiffs are informed and believe and thereon allege that Defendant Venus
17 Mosley is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
18 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
19 incident in Las Vegas, Nevada.

20 550. Plaintiffs are informed and believe and thereon allege that Defendant Kylie D.
21 Mulcahy is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
22 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
23 incident in Las Vegas, Nevada.

24 551. Plaintiffs are informed and believe and thereon allege that Defendant Sean P.
25 Mullaly is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
26 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
27 incident in Las Vegas, Nevada.

1 552. Plaintiffs are informed and believe and thereon allege that Defendant Mia Mumford
2 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 553. Plaintiffs are informed and believe and thereon allege that Defendant Esther Munoz
6 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
7 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
8 Las Vegas, Nevada.

9 554. Plaintiffs are informed and believe and thereon allege that Defendant DeAngelo
10 Murillo is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 555. Plaintiffs are informed and believe and thereon allege that Defendant Ronald
14 Murray is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 556. Plaintiffs are informed and believe and thereon allege that Defendant Riley
18 Musgrave is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 557. Plaintiffs are informed and believe and thereon allege that Defendant Macy Myers
22 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
23 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
24 Nevada.

25 558. Plaintiffs are informed and believe and thereon allege that Defendant Joan Myles is
26 a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
27 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
28 Las Vegas, Nevada.

1 559. Plaintiffs are informed and believe and thereon allege that Defendant Mark Myszak
2 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 560. Plaintiffs are informed and believe and thereon allege that Defendant Mohammad
6 Nassar is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 561. Plaintiffs are informed and believe and thereon allege that Defendant Gregory L.
10 Nelson is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 562. Plaintiffs are informed and believe and thereon allege that Defendant Chayla
14 Nepote is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 563. Plaintiffs are informed and believe and thereon allege that Defendant Sandy
18 Nguyen is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 564. Plaintiffs are informed and believe and thereon allege that Defendant Annetta
22 Nicholson is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 565. Plaintiffs are informed and believe and thereon allege that Defendant Lela Jean
26 Norton is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 566. Plaintiffs are informed and believe and thereon allege that Defendant Toby
2 Norwood is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 567. Plaintiffs are informed and believe and thereon allege that Defendant Savanna
6 Ochoa is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 568. Plaintiffs are informed and believe and thereon allege that Defendant Mfalme Odie
10 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 569. Plaintiffs are informed and believe and thereon allege that Defendant Alicia M.
14 Olive is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 570. Plaintiffs are informed and believe and thereon allege that Defendant Jenna O'Neal
18 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 571. Plaintiffs are informed and believe and thereon allege that Defendant Donald Orlan
22 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
23 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
24 Las Vegas, Nevada.

25 572. Plaintiffs are informed and believe and thereon allege that Defendant Annette
26 Orozco is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 573. Plaintiffs are informed and believe and thereon allege that Defendant Noemi
2 Orozco is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 574. Plaintiffs are informed and believe and thereon allege that Defendant Victor
6 Orschel is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 575. Plaintiffs are informed and believe and thereon allege that Defendant Tanny Owens
10 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 576. Plaintiffs are informed and believe and thereon allege that Defendant Joseph Pace
14 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
15 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
16 Nevada.

17 577. Plaintiffs are informed and believe and thereon allege that Defendant Carlos Padilla
18 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 578. Plaintiffs are informed and believe and thereon allege that Defendant Bacarri Page
22 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
23 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
24 Las Vegas, Nevada.

25 579. Plaintiffs are informed and believe and thereon allege that Defendant Bonnie
26 Palazzola is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 580. Plaintiffs are informed and believe and thereon allege that Defendant Naomi
2 Pantiru is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 581. Plaintiffs are informed and believe and thereon allege that Defendant Neptali
6 Paredes-Figueroa is a citizen of the State of Nevada, County of Clark. Defendant has, through
7 counsel, asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017,
8 shooting incident in Las Vegas, Nevada.

9 582. Plaintiffs are informed and believe and thereon allege that Defendant Chad Parisien
10 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 583. Plaintiffs are informed and believe and thereon allege that Defendant Thomasina
14 Parker is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 584. Plaintiffs are informed and believe and thereon allege that Defendant Yvette Parker
18 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 585. Plaintiffs are informed and believe and thereon allege that Defendant Bridget
22 Parkington is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 586. Plaintiffs are informed and believe and thereon allege that Defendant Brittney
26 Parkington is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 587. Plaintiffs are informed and believe and thereon allege that Defendant Alina Parrish
2 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 588. Plaintiffs are informed and believe and thereon allege that Defendant Michelle
6 Pearson is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 589. Plaintiffs are informed and believe and thereon allege that Defendant Christopher
10 C. Peirce is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 590. Plaintiffs are informed and believe and thereon allege that Defendant James Pelz is
14 a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
16 Las Vegas, Nevada.

17 591. Plaintiffs are informed and believe and thereon allege that Defendant Kayla Perez
18 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 592. Plaintiffs are informed and believe and thereon allege that Defendant Jeffrey
22 Perkins is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 593. Plaintiffs are informed and believe and thereon allege that Defendant Durwin Perry
26 Jr. is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted
27 or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident
28 in Las Vegas, Nevada.

1 594. Plaintiffs are informed and believe and thereon allege that Defendant Sharon
2 Pettaway is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 595. Plaintiffs are informed and believe and thereon allege that Defendant Celina Phem
6 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
7 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
8 Las Vegas, Nevada.

9 596. Plaintiffs are informed and believe and thereon allege that Defendant Jeannetta
10 Polite is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 597. Plaintiffs are informed and believe and thereon allege that Defendant Cory Polizzi
14 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
16 Las Vegas, Nevada.

17 598. Plaintiffs are informed and believe and thereon allege that Defendant Tyresha Polk
18 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 599. Plaintiffs are informed and believe and thereon allege that Defendant Antonio
22 Ponciano is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 600. Plaintiffs are informed and believe and thereon allege that Defendant Tiffany
26 Raecene Pope is a citizen of the State of Nevada, County of Clark. Defendant has, through
27 counsel, asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017,
28 shooting incident in Las Vegas, Nevada.

1 601. Plaintiffs are informed and believe and thereon allege that Defendant Beatrice
2 Potter is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 602. Plaintiffs are informed and believe and thereon allege that Defendant David
6 Preciado is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
7 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
8 Las Vegas, Nevada.

9 603. Plaintiffs are informed and believe and thereon allege that Defendant Maria
10 Preciado is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 604. Plaintiffs are informed and believe and thereon allege that Defendant Drake
14 Pritchett is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 605. Plaintiffs are informed and believe and thereon allege that Defendant Brittany Lynn
18 Quintero is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 606. Plaintiffs are informed and believe and thereon allege that Defendant Rashida
22 Raines is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 607. Plaintiffs are informed and believe and thereon allege that Defendant Ina Ramirez
26 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
27 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
28 Las Vegas, Nevada.

1 608. Plaintiffs are informed and believe and thereon allege that Defendant Maria
2 Ramirez is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 609. Plaintiffs are informed and believe and thereon allege that Defendant Rommel
6 Ramos is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 610. Plaintiffs are informed and believe and thereon allege that Defendant Jihad
10 Randolph is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 611. Plaintiffs are informed and believe and thereon allege that Defendant Paulette
14 Raphael is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 612. Plaintiffs are informed and believe and thereon allege that Defendant Oscar Rapio
18 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
19 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
20 Nevada.

21 613. Plaintiffs are informed and believe and thereon allege that Defendant Lawrence
22 Raybuck is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 614. Plaintiffs are informed and believe and thereon allege that Defendant Paula Jane
26 Reid is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 615. Plaintiffs are informed and believe and thereon allege that Defendant Katherine
2 Renfro is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 616. Plaintiffs are informed and believe and thereon allege that Defendant Garland
6 Reyes is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
7 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
8 Nevada.

9 617. Plaintiffs are informed and believe and thereon allege that Defendant Kimberly
10 Richie is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 618. Plaintiffs are informed and believe and thereon allege that Defendant Mike
14 Richmeier is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 619. Plaintiffs are informed and believe and thereon allege that Defendant Chamika
18 Roberson is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 620. Plaintiffs are informed and believe and thereon allege that Defendant Dontae Laroi
22 Robinson is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 621. Plaintiffs are informed and believe and thereon allege that Defendant Margo
26 Robinson is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 622. Plaintiffs are informed and believe and thereon allege that Defendant Josette Rocha
2 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 623. Plaintiffs are informed and believe and thereon allege that Defendant Angelita F.
6 Rodriguez is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 624. Plaintiffs are informed and believe and thereon allege that Defendant Tonia Roland
10 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
11 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
12 Nevada.

13 625. Plaintiffs are informed and believe and thereon allege that Defendant Janeann
14 Rollins is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 626. Plaintiffs are informed and believe and thereon allege that Defendant Desiree
18 Rondeau is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 627. Plaintiffs are informed and believe and thereon allege that Defendant Raquel Rooks
22 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
23 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
24 Las Vegas, Nevada.

25 628. Plaintiffs are informed and believe and thereon allege that Defendant Antawn Ross
26 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
27 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
28 Las Vegas, Nevada.

1 629. Plaintiffs are informed and believe and thereon allege that Defendant Tirrelle Ross
2 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 630. Plaintiffs are informed and believe and thereon allege that Defendant Allan
6 Rousseau is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 631. Plaintiffs are informed and believe and thereon allege that Defendant Shirley
10 Ruelas is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 632. Plaintiffs are informed and believe and thereon allege that Defendant Anthony
14 Rufo is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 633. Plaintiffs are informed and believe and thereon allege that Defendant Steve Sagely
18 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 634. Plaintiffs are informed and believe and thereon allege that Defendant Heather
22 Sallan is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
23 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
24 Nevada.

25 635. Plaintiffs are informed and believe and thereon allege that Defendant Lisa Kim M.
26 Sammons is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
27 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
28 Las Vegas, Nevada.

1 636. Plaintiffs are informed and believe and thereon allege that Defendant Princess
2 Santos is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
3 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 637. Plaintiffs are informed and believe and thereon allege that Defendant Melissa
6 Saucedo is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
7 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
8 Las Vegas, Nevada.

9 638. Plaintiffs are informed and believe and thereon allege that Defendant Katree
10 Saunders is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 639. Plaintiffs are informed and believe and thereon allege that Defendant Alissa Savath
14 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
16 Las Vegas, Nevada.

17 640. Plaintiffs are informed and believe and thereon allege that Defendant Eugene
18 Schavers is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 641. Plaintiffs are informed and believe and thereon allege that Defendant Gloria J.
22 Schryver is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
23 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
24 Las Vegas, Nevada.

25 642. Plaintiffs are informed and believe and thereon allege that Defendant Sara Beth
26 Schussler is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 643. Plaintiffs are informed and believe and thereon allege that Defendant Roderick
2 Rico Scott is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 644. Plaintiffs are informed and believe and thereon allege that Defendant Sydney
6 Shaver is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
7 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
8 Nevada.

9 645. Plaintiffs are informed and believe and thereon allege that Defendant Corey Shipp
10 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 646. Plaintiffs are informed and believe and thereon allege that Defendant Joe Shipp is a
14 citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
16 Las Vegas, Nevada.

17 647. Plaintiffs are informed and believe and thereon allege that Defendant Joyce Shipp
18 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 648. Plaintiffs are informed and believe and thereon allege that Defendant Tamala
22 Siegel is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 649. Plaintiffs are informed and believe and thereon allege that Defendant Johanna
26 Simeon is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 650. Plaintiffs are informed and believe and thereon allege that Defendant Gary Eliot
2 Simmons is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 651. Plaintiffs are informed and believe and thereon allege that Defendant Justin E.
6 Simmons is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 652. Plaintiffs are informed and believe and thereon allege that Defendant Fleming
10 Smith III is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 653. Plaintiffs are informed and believe and thereon allege that Defendant Calvin Smith
14 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
15 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
16 Nevada.

17 654. Plaintiffs are informed and believe and thereon allege that Defendant Imelda Smith
18 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
19 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
20 Nevada.

21 655. Plaintiffs are informed and believe and thereon allege that Defendant Iyuna Smith
22 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
23 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
24 Las Vegas, Nevada.

25 656. Plaintiffs are informed and believe and thereon allege that Defendant Joaneke
26 Smith is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 657. Plaintiffs are informed and believe and thereon allege that Defendant Jolanda Smith
2 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
3 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 658. Plaintiffs are informed and believe and thereon allege that Defendant Levonne
6 Smith is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
7 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
8 Nevada.

9 659. Plaintiffs are informed and believe and thereon allege that Defendant Tina Smith is
10 a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
11 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

12 660. Plaintiffs are informed and believe and thereon allege that Defendant Elizabeth
13 Socci is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
14 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
15 Nevada.

16 661. Plaintiffs are informed and believe and thereon allege that Defendant Lisa Soininen
17 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
18 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
19 Nevada.

20 662. Plaintiffs are informed and believe and thereon allege that Defendant Daysi M.
21 Solano is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
22 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
23 Nevada.

24 663. Plaintiffs are informed and believe and thereon allege that Defendant Armando
25 Solis Jr. is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
26 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
27 Nevada.

1 664. Plaintiffs are informed and believe and thereon allege that Defendant Armando
2 Solis is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
3 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 665. Plaintiffs are informed and believe and thereon allege that Defendant Steven
6 Sonnenburg is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 666. Plaintiffs are informed and believe and thereon allege that Defendant Karla Sorrosa
10 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 667. Plaintiffs are informed and believe and thereon allege that Defendant Michelle
14 Souza is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
15 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
16 Nevada.

17 668. Plaintiffs are informed and believe and thereon allege that Defendant Pasquale
18 Spano is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
19 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
20 Nevada.

21 669. Plaintiffs are informed and believe and thereon allege that Defendant Ronika
22 Spears is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
23 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
24 Nevada.

25 670. Plaintiffs are informed and believe and thereon allege that Defendant Sherwin
26 St. John is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 671. Plaintiffs are informed and believe and thereon allege that Defendant Michael
2 Staley is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
3 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 672. Plaintiffs are informed and believe and thereon allege that Defendant Shannan
6 Stearns is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 673. Plaintiffs are informed and believe and thereon allege that Defendant Kenneth
10 Steward is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 674. Plaintiffs are informed and believe and thereon allege that Defendant Clarence
14 Stockton is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 675. Plaintiffs are informed and believe and thereon allege that Defendant Valerie Stout
18 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
19 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
20 Nevada.

21 676. Plaintiffs are informed and believe and thereon allege that Defendant Vincent
22 Sullivan is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
23 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
24 Las Vegas, Nevada.

25 677. Plaintiffs are informed and believe and thereon allege that Defendant Lisa Sulvetta
26 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
27 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
28 Nevada.

1 678. Plaintiffs are informed and believe and thereon allege that Defendant Jack
2 Summerlin is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 679. Plaintiffs are informed and believe and thereon allege that Defendant Shawna
6 Sutton is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
7 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
8 Nevada.

9 680. Plaintiffs are informed and believe and thereon allege that Defendant John Swayzer
10 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
11 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
12 Nevada.

13 681. Plaintiffs are informed and believe and thereon allege that Defendant Larry Gordon
14 Swift is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 682. Plaintiffs are informed and believe and thereon allege that Defendant Meron
18 Tadesse is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
19 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
20 Nevada.

21 683. Plaintiffs are informed and believe and thereon allege that Defendant Shonte Talley
22 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
23 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
24 Las Vegas, Nevada.

25 684. Plaintiffs are informed and believe and thereon allege that Defendant Graciela
26 Tapia is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
27 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
28 Nevada.

1 685. Plaintiffs are informed and believe and thereon allege that Defendant Betty Taylor
2 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
3 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 686. Plaintiffs are informed and believe and thereon allege that Defendant Lauren D.
6 Taylor is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
7 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
8 Nevada.

9 687. Plaintiffs are informed and believe and thereon allege that Defendant Kellie
10 Tederman is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 688. Plaintiffs are informed and believe and thereon allege that Defendant Treasure
14 Tellis is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 689. Plaintiffs are informed and believe and thereon allege that Defendant Diane Tharpe
18 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 690. Plaintiffs are informed and believe and thereon allege that Defendant Christina
22 Thomas is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
23 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
24 Nevada.

25 691. Plaintiffs are informed and believe and thereon allege that Defendant Karnesha
26 Thomas is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
27 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
28 Nevada.

1 692. Plaintiffs are informed and believe and thereon allege that Defendant Bailey
2 Thompson is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 693. Plaintiffs are informed and believe and thereon allege that Defendant Keely
6 Thompson is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
7 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
8 Las Vegas, Nevada.

9 694. Plaintiffs are informed and believe and thereon allege that Defendant Angela Todd
10 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 695. Plaintiffs are informed and believe and thereon allege that Defendant Richard
14 Toffolla is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
16 Las Vegas, Nevada.

17 696. Plaintiffs are informed and believe and thereon allege that Defendant Todd Tomlin
18 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
19 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
20 Nevada.

21 697. Plaintiffs are informed and believe and thereon allege that Defendant Rafael
22 Torregano is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
23 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
24 Las Vegas, Nevada.

25 698. Plaintiffs are informed and believe and thereon allege that Defendant Quincy
26 Torres is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 699. Plaintiffs are informed and believe and thereon allege that Defendant Rosalia
2 Torres is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
3 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 700. Plaintiffs are informed and believe and thereon allege that Defendant Veronica
6 Torres is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 701. Plaintiffs are informed and believe and thereon allege that Defendant Jordan E.
10 Tremper is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 702. Plaintiffs are informed and believe and thereon allege that Defendant Colin Trevino
14 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
16 Las Vegas, Nevada.

17 703. Plaintiffs are informed and believe and thereon allege that Defendant Francesca
18 Trujillo is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
20 incident in Las Vegas, Nevada.

21 704. Plaintiffs are informed and believe and thereon allege that Defendant Isabella
22 Trujillo is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
23 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
24 Nevada.

25 705. Plaintiffs are informed and believe and thereon allege that Defendant Samuel Lee
26 Trujillo is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 706. Plaintiffs are informed and believe and thereon allege that Defendant Maryloc
2 Trushel is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 707. Plaintiffs are informed and believe and thereon allege that Defendant Tanisha
6 Turner is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
7 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
8 Nevada.

9 708. Plaintiffs are informed and believe and thereon allege that Defendant Janette A.
10 Uribe is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
12 incident in Las Vegas, Nevada.

13 709. Plaintiffs are informed and believe and thereon allege that Defendant Sandra
14 Velasquez is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
16 Las Vegas, Nevada.

17 710. Plaintiffs are informed and believe and thereon allege that Defendant Edgar
18 Vicente is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
19 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
20 Nevada.

21 711. Plaintiffs are informed and believe and thereon allege that Defendant Alma Delia
22 Villa is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 712. Plaintiffs are informed and believe and thereon allege that Defendant Njeri Wade is
26 a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
27 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.
28

1 713. Plaintiffs are informed and believe and thereon allege that Defendant Autumn
2 Wake is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
3 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 714. Plaintiffs are informed and believe and thereon allege that Defendant Imelda
6 Walker is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
7 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
8 Nevada.

9 715. Plaintiffs are informed and believe and thereon allege that Defendant Kamia
10 Walker is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
11 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
12 Nevada.

13 716. Plaintiffs are informed and believe and thereon allege that Defendant Lori Waller is
14 a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
15 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

16 717. Plaintiffs are informed and believe and thereon allege that Defendant Mario Waller
17 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
18 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
19 Nevada.

20 718. Plaintiffs are informed and believe and thereon allege that Defendant Penise Waller
21 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
22 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
23 Nevada.

24 719. Plaintiffs are informed and believe and thereon allege that Defendant Alex Walters
25 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
26 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
27 Las Vegas, Nevada.

1 720. Plaintiffs are informed and believe and thereon allege that Defendant Odjessica
2 Ward is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
3 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 721. Plaintiffs are informed and believe and thereon allege that Defendant Shawn
6 Washburn is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 722. Plaintiffs are informed and believe and thereon allege that Defendant Darnell S.
10 Watts is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
11 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
12 Nevada.

13 723. Plaintiffs are informed and believe and thereon allege that Defendant Randall
14 Webb is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
15 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
16 Nevada.

17 724. Plaintiffs are informed and believe and thereon allege that Defendant Marcus
18 Wellmaker is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 725. Plaintiffs are informed and believe and thereon allege that Defendant Juan Wesley
22 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
23 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
24 Nevada.

25 726. Plaintiffs are informed and believe and thereon allege that Defendant Gladys
26 Whitehurst is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 727. Plaintiffs are informed and believe and thereon allege that Defendant Nicole
2 Whitlock is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 728. Plaintiffs are informed and believe and thereon allege that Defendant William
6 Wieger is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 729. Plaintiffs are informed and believe and thereon allege that Defendant Annie
10 Wiggins is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 730. Plaintiffs are informed and believe and thereon allege that Defendant Chisca Wiley
14 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
16 Las Vegas, Nevada.

17 731. Plaintiffs are informed and believe and thereon allege that Defendant Craig A.
18 Williams is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
19 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
20 Las Vegas, Nevada.

21 732. Plaintiffs are informed and believe and thereon allege that Defendant Leon
22 Williams is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 733. Plaintiffs are informed and believe and thereon allege that Defendant Noah
26 Williams is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 734. Plaintiffs are informed and believe and thereon allege that Defendant Teri Williams
2 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
3 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
4 Las Vegas, Nevada.

5 735. Plaintiffs are informed and believe and thereon allege that Defendant Julia
6 Williams-Long is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
7 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
8 Las Vegas, Nevada.

9 736. Plaintiffs are informed and believe and thereon allege that Defendant Rina
10 Williamson is a citizen of the State of Nevada. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 737. Plaintiffs are informed and believe and thereon allege that Defendant L'Tanya
14 Wilson is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened
15 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
16 Nevada.

17 738. Plaintiffs are informed and believe and thereon allege that Defendant Donna
18 Wilson-Demmon is a citizen of the State of Nevada, County of Clark. Defendant has, through
19 counsel, asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017,
20 shooting incident in Las Vegas, Nevada.

21 739. Plaintiffs are informed and believe and thereon allege that Defendant Sarah Ann
22 Wittstock is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 740. Plaintiffs are informed and believe and thereon allege that Defendant Robyn-Lee
26 Wolchyn is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
27 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
28 incident in Las Vegas, Nevada.

1 741. Plaintiffs are informed and believe and thereon allege that Defendant Tammy
2 Wolfe is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
3 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
4 incident in Las Vegas, Nevada.

5 742. Plaintiffs are informed and believe and thereon allege that Defendant Latricia
6 Woods is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
8 incident in Las Vegas, Nevada.

9 743. Plaintiffs are informed and believe and thereon allege that Defendant Nikki Woods
10 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
11 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
12 Nevada.

13 744. Plaintiffs are informed and believe and thereon allege that Defendant Nishon
14 Woods is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
15 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
16 incident in Las Vegas, Nevada.

17 745. Plaintiffs are informed and believe and thereon allege that Defendant Shay Wright
18 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
19 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
20 Nevada.

21 746. Plaintiffs are informed and believe and thereon allege that Defendant Joshua
22 Wrzesinsk is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
23 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
24 incident in Las Vegas, Nevada.

25 747. Plaintiffs are informed and believe and thereon allege that Defendant Andre Wyatt
26 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
27 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
28 Nevada.

1 748. Plaintiffs are informed and believe and thereon allege that Defendant Michael Yang
 2 is a citizen of the State of Nevada. Defendant has, through counsel, asserted or threatened to
 3 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
 4 Nevada.

5 749. Plaintiffs are informed and believe and thereon allege that Defendant Gerald
 6 Yeager is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
 7 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
 8 incident in Las Vegas, Nevada.

9 750. Plaintiffs are informed and believe and thereon allege that Defendant Kenya R.
 10 Young is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
 11 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
 12 incident in Las Vegas, Nevada.

13 751. Plaintiffs are informed and believe and thereon allege that Defendant Roye Young
 14 is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel, asserted or
 15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
 16 Las Vegas, Nevada.

17 752. Plaintiffs are informed and believe and thereon allege that Defendant Vassar D.
 18 Young is a citizen of the State of Nevada, County of Clark. Defendant has, through counsel,
 19 asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting
 20 incident in Las Vegas, Nevada.

21 753. Plaintiffs are informed and believe and thereon allege that Defendant Jessica
 22 Lauren Zetterberg is a citizen of the State of Nevada, County of Clark. Defendant has, through
 23 counsel, asserted or threatened to assert claims against Plaintiffs based upon the October 1, 2017,
 24 shooting incident in Las Vegas, Nevada

25 **JURISDICTION AND VENUE**

26 754. This Court has subject-matter jurisdiction pursuant to 28 U.S.C. § 1331 and
 27 6 U.S.C. §442(a). As alleged hereinabove, the SAFETY Act expressly provides for original and
 28 exclusive federal jurisdiction over actions arising from or relating to acts of mass violence where

1 technologies or services certified by the Secretary of Homeland Security were deployed. At the
 2 time of Paddock's mass attack at the Route 91 concert, security services were provided by
 3 Contemporary Services Corporation as the Security Vendor for the Route 91 Harvest Festival.
 4 CSC's security services were certified by the Secretary of Homeland Security under the SAFETY
 5 Act.

6 755. This Court has personal jurisdiction over Defendants because they are residents of
 7 the State of Nevada and are therefore subject to the general personal jurisdiction of this Court.

8 756. Venue is proper in this Judicial District pursuant to 28 U.S.C. § 1391(b)(1)
 9 because one or more of the Defendants are known to reside, or upon information and belief, do
 10 reside, within this Judicial District.

FIRST CAUSE OF ACTION FOR DECLATORY RELIEF

(By Plaintiffs against all Defendants)

13 757. Plaintiffs reallege and incorporate by reference, as though fully set forth, the
 14 allegations of paragraphs 1-270, above.

15 758. Following Paddock's mass attack on the concert, over 2,500 individuals have either
 16 sued the MGM Parties, or threatened to sue the MGM Parties, for claims alleged to arise from or
 17 relate to the attack. Several hundred individuals filed suit, and before the issues could be joined or
 18 resolved, they dismissed their claims, apparently with the intent of refileing.

19 759. Each Defendant either (a) has previously filed suit (and then dismissed it) against
 20 one or more of the MGM Parties relating to the Paddock attack, or (b) through counsel has stated
 21 an intention to sue the MGM Parties relating to the attack. There is no pending litigation between
 22 Plaintiffs and Defendants relating to the attack.

23 760. The claims alleged in the now-dismissed lawsuits include claims of alleged
 24 negligence by the MGM Parties and others, including CSC, in protecting and safeguarding persons
 25 including those Defendants who attended the Route 91 Festival.

26 761. Defendants' actual and threatened lawsuits implicate the services provided by CSC
 27 because they implicate security at the concert, including training, emergency response, evacuation
 28 and adequacy of egress.

1 762. These claims are subject to the SAFETY Act, because (a) they arise from and relate
 2 to an act of mass violence meeting the statutory requirements; (b) CSC provided security at the
 3 concert, deploying services certified by the Department of Homeland Security under the SAFETY
 4 Act to protect against or respond to such an attack; and (c) the claims may therefore result in loss
 5 to CSC as the “Seller” of such certified services.

6 763. The claims threatened against the MGM Parties by certain Defendants, through
 7 counsel, also inevitably fall under the SAFETY Act for the very same reasons: (a) they arise from
 8 and relate to an act of mass violence meeting the statutory requirements; (b) CSC provided
 9 security at the concert, deploying services certified by the Department of Homeland Security
 10 under the SAFETY Act to protect against or respond to such an attack; and (c) the claims may
 11 therefore result in loss to CSC as the “Seller” of such certified services. If Defendants were injured
 12 by Paddock’s assault, as they allege, they were inevitably injured both because Paddock fired from
 13 his window *and* because they remained in the line of fire at the concert. Such claims inevitably
 14 implicate security at the concert—and may result in loss to CSC.

15 764. The SAFETY Act applies to claims “arising out of, relating to, or resulting from an
 16 act of terrorism.”

17 765. The SAFETY Act defines an act of terrorism: An act meets the requirements if the
 18 act is (i) “unlawful” (ii) “causes harm to a person ... in the United States,” and (iii) “uses
 19 or attempts to use ... weapons ... designed or intended to cause mass ... injury.”

20 6 U.S.C. § 444(2)(B). There is no requirement in the statute or regulations of an ideological
 21 motive or objective for the attack for it to meet the requirements of the SAFETY Act.

22 766. Paddock’s mass attack satisfies the requirements of the SAFETY Act and the
 23 regulations: (i) it was “unlawful,” (ii) it resulted in death or injury to hundreds of persons in the
 24 United States, and (iii) it involved weapons and other instrumentalities that were designed and
 25 intended to cause, and which in fact caused, mass injury and death. Those weapons and
 26 instrumentalities included rifles modified with bump stocks to spray fully automatic gun fire;
 27 high-capacity magazines capable of holding between 60 and 100 rounds; and illegal incendiary
 28 rounds intended to blow up the fuel tanks adjacent to the concert. Paddock used these weapons

1 and instrumentalities to fire hundreds of rounds at the crowd, and he fired incendiary rounds
2 which struck the fuel tanks but, fortunately, missed the fuel.

3 767. The post-attack investigation revealed that Paddock brought in his van, which he
4 parked in the hotel garage, 90 pounds of explosives, consisting of 20 two-pound containers of
5 exploding targets, 10 one-pound containers of exploding targets and 2 twenty-pound bags of
6 explosive precursors.

7 768. No MGM Party attempted to commit, knowingly participated in, aided, abetted,
8 committed, or participated in any conspiracy to commit any act of terrorism of criminal act related
9 to mass attack perpetrated by Stephen Paddock at the Route 91 Harvest Festival in Las Vegas,
10 Nevada, on October 1, 2017.

11 769. The Secretary of Homeland Security may make a determination that conduct in
12 question meets the statutory requirement, but neither the Act nor the regulations requires a formal
13 certification. The Statute provides that the Secretary shall have exclusive authority to certify
14 services, but the authority to determine whether an act of mass violence meets the statutory
15 requirements is not exclusive to the Secretary.

16 770. Public statements by the Secretary of Homeland Security concerning the attack
17 make clear that the attack meets the requirements of the SAFETY Act; indeed, based on the plain
18 language of the statute, the regulations, and the facts, no other determination could be possible.

19 771. In congressional testimony on November 30, 2017, the Acting Secretary of
20 Homeland Security noted the emphasis of “terrorists and other violent criminals ... on attacking
21 soft targets,” including “recent tragedies in Nevada.” The Acting Secretary went on to note that
22 the “SAFETY Act Program” “provide[s] critical incentives for the development and deployment
23 of anti-terrorism technologies by providing liability protections for ‘qualified anti-terrorism
24 technologies,’” which applies to a number of large sports and entertainment venues nationwide.

25 772. In a May 2018 release, Department of Homeland Security noted that “mass
26 shootings” in various places, including at a “concert,” aim “to kill and maim unsuspecting
27 individuals” and thereby fall within the Department’s “primary mission” “to prevent terrorist
28 attacks within the U.S, reduce the vulnerability of the U.S. to terrorism, and minimize the damage

1 and assist in the recovery from terrorist attacks that do occur, including those in ST-CPs
 2 [soft-targets-crowded places].” Department of Homeland Security, *Soft Targets and Crowded*
 3 *Places Security Plan Overview*, May 2018, at page 2. The report goes on to note that the
 4 protections of the SAFETY Act have been “approved for open venues such as sports arenas and
 5 stadia” – such as the venue for the Route 91 Festival. *Id.* at p. 17.

6 773. The Department continues its critical work to prevent and respond to mass
 7 violence. In Congressional testimony on May 15, 2018, the Secretary testified that DHS is
 8 “seeking to ramp up ‘soft target’ security efforts,” noting that DHS programs “address threats to
 9 soft targets – including schools, *entertainment venues*, major events, and public spaces” (emphasis
 10 added). Further, on June 4, 2018, DHS announced that it had “developed a ST-CP Security
 11 Enhancement and Coordination Plan,” which has not been made public. The plan addresses “the
 12 increased emphasis *by terrorists* and other extremist actors to leverage less sophisticated methods
 13 to inflict harm in public areas ... such as parks, ... *special event venues*, and similar facilities.”
 14 See <https://www.dhs.gov/publication/securing-soft-targets-and-crowded-spaces> (emphasis added).

15 774. The SAFETY Act creates a single, exclusive federal cause of action for claims for
 16 injuries arising out of or relating to acts of mass violence where services certified by the
 17 Department of Homeland Security were deployed in defense against, response to, or recovery
 18 from such act and such claims result or may result in loss to the Seller.

19 775. Pursuant to the SAFETY Act, the Department of Homeland Security has certified
 20 the services provided by CSC. The DHS Certification recognizes CSC’s security services as
 21 appropriate for preventing and responding to acts of mass violence. 6 U.S.C. § 441; *see also*
 22 48 C.F.R. § 50.201.

23 776. CSC’s security services Certified by DHS include “Physical Security”; “Access
 24 Control”; and “Crowd Management.”

25 777. CSC’s Certified Crowd Management Services include:

- 26 • “Awareness of venue-specific emergency response protocols and evacuation
 27 procedures to include emergency alert and mass-notification systems and sheltering procedures”;
- 28 • “Pre-event venue / event safety inspections”;

1 • “Facilitation of crowd movement during ingress, circulation, sheltering in place,
2 emergency evacuations, and egress”;

3 • “Pre-event coordination and multi-agency collaboration with public safety
4 agencies”;

5 • “Selection, vetting, and training of employees.”

6 778. As alleged above, CSC was employed as the Security Vendor for the Route 91
7 concert. CSC’s responsibilities at the Route 91 Harvest Festival included providing the following
8 DHS Certified Services:

9 • “perimeter security, event access, festival grounds event security”;

10 • “Staff[ing] inner perimeter and gates”;

11 • “Protect[ing] against unauthorized access”;

12 • “early warning ... of perimeter breaches”;

13 • “Secur[ing] internal festival grounds”;

14 • “Patrol[ing] festival floor grounds and assist[ing] patrons with any security related
15 issues”;

16 • pre-event planning for “Security and Safety”;

17 • “Emergency response” and “evacuation,” including evacuation for “terrorist threat”
18 and “ensur[ing] that the exit routes and gates remain unobstructed.”

19 779. For the reasons set forth above, the SAFETY Act creates an exclusive cause of
20 action for any claims arising out of relating to Paddock’s mass attack and such claims may result
21 in loss to the Seller. Under the SAFETY Act, there “shall exist only one cause of action for loss
22 of property, personal injury, or death. 6 C.F.R. 25.7 (d).

23 780. Such cause of action “may be brought only against the Seller of the Qualified Anti-
24 Terrorism Technology and may not be brought against the buyers, the buyer’s contractors, or
25 downstream users of the Technology, the Seller’s suppliers or contractors, or any other person or
26 entity.” 6 C.F.R. 25.7 (d). The SAFETY Act precludes any liability on the part of Plaintiffs to
27 Defendants relating to Paddock’s mass attack.

781. In addition, the SAFETY Act provides that for any covered claims arising out of or relating to an act of mass violence where certified services were provided, “the government contractor defense applies in such a lawsuit,” which provides a complete defense to liability. 6 U.S.C. 442(d)(1). The government contractor defense precludes any finding of liability on the part of Plaintiffs to Defendants relating to Paddock’s mass attack.

782. An actual and justiciable controversy exists between Plaintiffs and Defendants concerning the applicability of the SAFETY Act. Plaintiffs assert that the SAFETY Act precludes any liability for any claims arising out of or relating to Paddock’s mass attack, whereas, on information and belief, Defendants deny that the Act applies or that it precludes liability on their claims against Plaintiffs.

783. A judicial declaration as to whether the SAFETY Act applies and precludes liability on Defendants’ claims against the Plaintiffs is necessary at this time so that the parties may ascertain their rights, and avoid the significant judicial waste that would occur if the lawsuits were allowed to proceed in the absence of a finding as to the applicability of the SAFETY Act.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs MGM Parties pray for judgment against Defendants, and each of them, as follows:

1. For a judicial declaration that:

- a. Defendants’ claims arising from the attack by Stephen Paddock on October 1, 2017 in Las Vegas, Nevada are subject to and governed by the SAFETY Act, 6 U.S.C. § 441 et seq.;
- b. the SAFETY Act precludes any finding of liability against Plaintiffs for any claim for injuries arising out of or related to Paddock’s mass attack, without prejudice to Defendants’ rights to pursue claims against the “Seller” under the Act, including to obtain proceeds of insurance that any such Seller was required by the Act to maintain;
- c. Plaintiffs have no liability of any kind to Defendants, or any of them, arising from the Paddock’s mass attack; and

2. For such other and further legal or equitable relief as the Court deems just and proper.

DATED: July 17, 2018

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